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AGREEMENT

Agreement on the Management and Administration

of Montana's Environmental Programs

for Federal Fiscal Year 1981

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September 1980

Approved:

The undersigned hereby execute this Agreement on the Management and Administration of Montana's Fiscal Year 1981 Water Pollution Control, Safe Drinking Water, Air Quality, Solid Waste Management, Radiation and Pesticides Programs.

State of Montana

Thomas L. Judge
Governor
State of Montana

Sept 15, 1980.
Date

A. C. Knight, M. D., F.C.C.P.
Director, Department of Health and
Environmental Sciences

Sept 15, 1980
Date

W. Gordon McOmber, Director
Department of Agriculture

SEP 15 1980
Date

Environmental Protection Agency

Roger L. Williams
Regional Administrator

Sept 24 1980
Date

Ivan W. Dodson, Director
Montana Office

Sept 15, 1980
Date

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INTRODUCTION

Governor Thomas L. Judge, in his 1980 State of the State Address, said:

> *If time is the best teacher, the lesson of the last year was that Montana is no longer an isolated fortress, but a neighborhood in a complex world. For years, this state was a mystery - a wild and beautiful place lost in the prairies and mountains between the Mississippi River and the Pacific Coast. Recently, however, this shield of isolation has been rediscovered, development is flourishing on the energy frontier and our coal, water and other resources are being subjected to intense pressures.*

The Departments of Health and Environmental Sciences (DHES) and Agriculture (DOA) are among the State agencies charged with protecting Montana's natural resources. As the federal counterpart to the DHES and DOA, the U.S. Environmental Protection Agency (EPA) has been charged with a Congressional mandate to administer various environmental programs.

Through grants, research, monitoring, technical expertise and other areas of cooperation, DHES, DOA and the EPA have taken lead roles in helping Montanans improve their quality of life.

The workload created by these diverse programs prompted EPA to inaugurate a novel approach to planning and management. The approach involves a comprehensive Montana/EPA Agreement (MEA), the aim of which is to consolidate all applications and narratives into one document. The result has been a reduction in paperwork and duplication of effort, and more efficient program management.

There has been little format change in the State programs addressed in the 1981 MEA, the programs include DOA's pesticide program and the DHES's air, water, radiation and solid waste management programs.

The elements of the MEA consist of: (1) an overview of the state's environment; (2) identification of objectives; (3) strategies to accomplish priorities, and (4) detailed work plans consisting of narrative descriptions of activities and resource commitments.

STATE ENVIRONMENTAL OVERVIEW

Clearly, the major objectives in environmental programs are to control pollution and to protect public health and the environment. Both state and national legislation contain many references to these objectives.

The references include:

Montana Pesticides Act:

> The purpose of the statute is the control of pesticides for the protection of man and his environment, including water, air, food, animals, vegetation, pollinating insects and shelter.

Clean Air Act of Montana:

> . . .to achieve and maintain such air quality as will protect human health and safety, and, to the greatest degree practicable, prevent injury to plant, animals, and property;. . .

Federal Clean Water Act:

> It is the policy of the Congress to recognize, preserve, and protect the primary responsibilities and rights of States to prevent, reduce, and eliminate pollution, to plan the development and use (including restoration, preservation, and enhancement) of land and water resources. . .

Montana Solid Waste Management Act:

> . . .control of solid waste management systems is intended "to conserve natural resources whenever possible" as well as to protect the public health and safety.

Determining the methods and approach to meeting these objectives is the business of federal, state and local environmental agencies. These organizations are in turn responsible for ensuring that all concerned parties are given the opportunity to participate in the decision-making process.

Decentralization

Recently there has been a shift from the overcentralized form of decision making and management, to a more responsive decentralized organization. Congress, working through the EPA and with cooperation from the states, has been expanding the philosophy that a decentralized organization can produce better results. Federal grants that enable states to assume program responsibilities are examples of that philosophy.

An important aspect of decentralization is delegation of responsibilities. Considerable progress has been made in delegating major program responsibilities from the EPA to the states, with Montana aggressively pursuing the delegation of most federal environmental programs. From a legislative perspective, the State has most of the required authorities covered in the MEA. Due to a lack of adequate financial and human resources, however, delegation of current EPA responsibilities continues to be a phased process. The completion of the delegation agreement for the Municipal Wastewater Facility Construction Grants Program under 205 (g) was a major effort achieved in Fiscal Year (FY) 1979. The implementation of that agreement was completed in FY 1980. Refinements to the original agreement will be the major initiative for FY 1981.

Three additional program areas will receive attention during FY 1981.

1. Hazardous Waste Management

   A delay in adopting the final EPA regulations precluded the State from assuming responsibility for the program.

The regulations were promulgated on May 19, 1980. Most of the State legislative requirements have been completed. The State is expected to receive interim authorization from EPA during FY 1981.

2. Prevention of Significant Deterioration (PSD)

The State had adopted regulations to assume this program. Negotiations with the EPA will be conducted during the next several months to ensure that federal guidelines are met. Approximately 25 PSD permits will need to be issued during FY 1981. By FY 1981 there will be little or no direct EPA permit issuance.

3. Noncompliance Penalties for Air Quality Violations

During the 1979 Legislative Session authority was granted for the State to assess penalties against stationary sources that violate provisions of the State Implementation Plan (SIP). Because of the potential magnitude of this legislation, the State will wait for the development of regulations by EPA. EPA will work closely with the State to facilitate delegation and provide appropriate assistance when needed.

Montana EPA Office

In an effort to strengthen working relationships between EPA and the State environmental programs, the Montana Office of EPA was formed in 1978. This decision to localize EPA's involvement has, in most instances, supplemented state program efforts and for other situations it helped alleviate state resource problems. Other additional assets have included the removal of many logistical problems, reduction of the need for formal communication and increased accessibility for the public to the EPA staff.

Public Health

The common denominator in most environmental programs is public health. Ever increasing amounts of harmful substances are being identified. The impact of these substances on the health of the public continues to be a concern. The reduction of public exposure to dangerous pollutants continues to be a high priority. Several studies have been initiated by the State addressing public health issues. The statewide Montana Air Pollution Study (MAPS), the Butte Radiation Study and the Pesticides Drift Study in the Kalispell area are a few of the noteworthy efforts. For FY 1981, the State and EPA will again establish as a chief objective, the identification, evaluation and control of pollutants that endanger public health.

Prevention

As a state, Montana has built a reputation for its commitment to preserve the quality of its land, water and air. When reviewing the State of Montana's environment, it becomes apparent that the state does not suffer from widespread and serious environmental degradation; a testimony

to the effectiveness of the State and its citizens in carrying out their commitment. Stationary air sources, point sources from water and solid waste/hazardous material disposal problems are known, and solutions are in the process of being proposed. The State and EPA cannot, however, take the position that threats to Montana's environmental integrity are under control. The prevention aspect of the environmental programs is particularly important to Montana. As an example, the production and export of energy has been steadily increasing (Figure #1). With energy development comes accompanying environmental impacts that require regulation. For the future, Montana, like every state that feels the pressure of conflict between natural and human needs, will have to guard against unplanned and unexpected threats to its environmental integrity. Therefore, an additional major objective of the State and EPA will be the vigorous enforcement of existing environmental legislation with an emphasis on new sources.

Energy Development

The apparent national rush to discover, extract and exploit new energy resources could prove to be, economically, socially and environmentally devastating. As our nation continues to develop and revise policies and programs directed to alleviate the energy crisis, Montana and its energy rich neighbors are being looked to for the bulk of the increase in domestic energy production.

The energy resource potential of Montana alone is immense. Coal reserves are measured in billions of tons. Potential oil and natural gas reserves are counted in billions of barrels and trillions of cubic feet. Hydropower on our river systems produces thousands of megawatts.

As the debate continues over which energy source -- oil, natural gas, coal, solar, geothermal, hydro, nuclear, wind or some exotic type --will solve our country's problems, one possibility appears almost certain: Montana, with its abundant resources, will play a major role in achieving the national goal of energy independence.

This assumption is gaining credibility by:

-- Congress' Recent Energy Mobilization Board legislation,
-- Department of Energy's synthetic fuel program proposals and coal production targets,
-- Department of Interior's resurrected coal leasing program,
-- coal consuming states' recent attacks on Montana's coal severance tax,
-- wilderness controversies and
-- by various other legislative and judicial attempts aimed at simplifying and expediting extraction and utilization of Montana's abundant energy related resources.

Montana has helped, and will continue to help, meet our nation's energy needs. But water flowing through turbines to generate electricity, burning coal turning water to steam to drive huge generators and the conversion of coal to synthetic natural gas or liquid cannot be accomplished without some inescapable and often unmitigatable environmental, social and economic costs. Montanans demand and expect to have a major role in determining those costs.

The State and EPA are committed to working together to develop consistent policies and applying mitigative measures to utilize Montana's resources without foregoing the amenities of clean air, pure water and productive lands. Without federal, state and local involvement and coordination, energy development in Montana could proceed with a rapidity and concentration that could overwhelm the ability of citizens and government agencies to adequately respond, control and mitigate the adverse impacts associated with increased energy development.

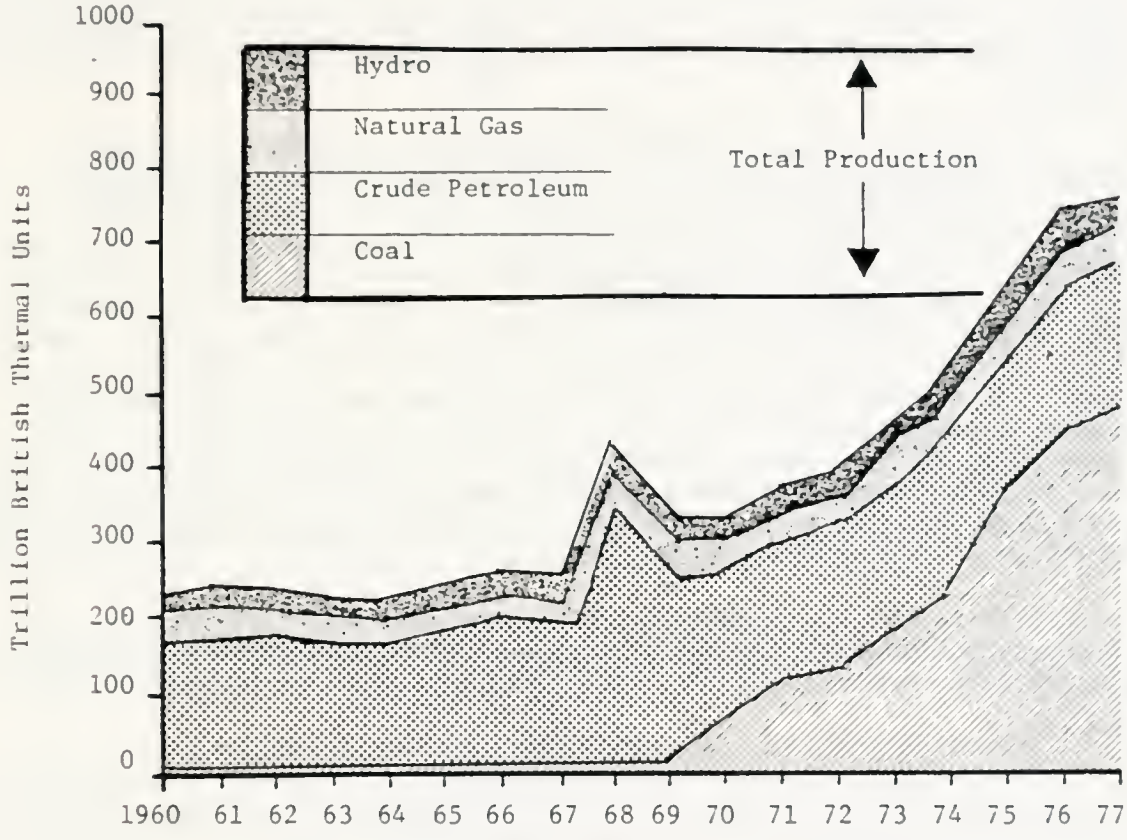


Figure 1 Production of Energy in Montana, By Type of Fuel, 1960-77

Program Environmental Summaries

The environmental problems in the State of Montana are as diverse as its geography. For this reason the precise definition of problems is an evolutionary process. As more resources and expertise become available, the more thorough problem definition becomes.

Presently most physical and chemical surface water quality conditions are generally known throughout the state. Comprehensive biological monitoring is underway, with statewide coverage scheduled for completion by 1982. Lake classification work under an EPA Section 314 grant is also underway, with completion scheduled for 1981. Fisheries classification

work has been recently completed by the Department of Fish, Wildlife and Parks (DFWP). The inventorying of drinking water supplies has been a continuing effort, with the majority of supplies investigated during 1978-79.

In Montana, as throughout the United States, a major emphasis is being placed upon the proper management of hazardous wastes. During fiscal year 1981, a comprehensive investigation will be undertaken to determine the extent of the hazardous waste problem and to establish the mechanisms to properly deal with that problem. The principal mechanism will be the state acquiring interim authorization to maintain a hazardous waste program in Montana. Through the next fiscal year, the extent of the solid waste problem will continue to be evaluated through such means as the open dump inventory.

Air quality problems related to sulfur dioxide (SO2) have been defined. Total suspended particulate (TSP) problems have been located; however, determining the causes, impacts and control techniques will require continued effort. Carbon Monoxide (CO) problems exist in at least three major cities. In order to determine the extent of the CO problem, additional data must be collected and modeling performed. More information needs to be collected to establish the extent of the lead problem. New source impacts, related to energy production and mining, on air quality are unknown and will require more monitoring and evaluation to prevent significant deterioration.

Groundwater data have historically been limited. The major initiative for FY 1981 will be EPA's inventorying of the underground injection control techniques and groundwater resources.

Human exposure to elevated levels of natural radioactivity has been defined, particularly in mineralized areas of Western Montana. Studies to determine the extent, magnitude and sources of these exposures are underway.

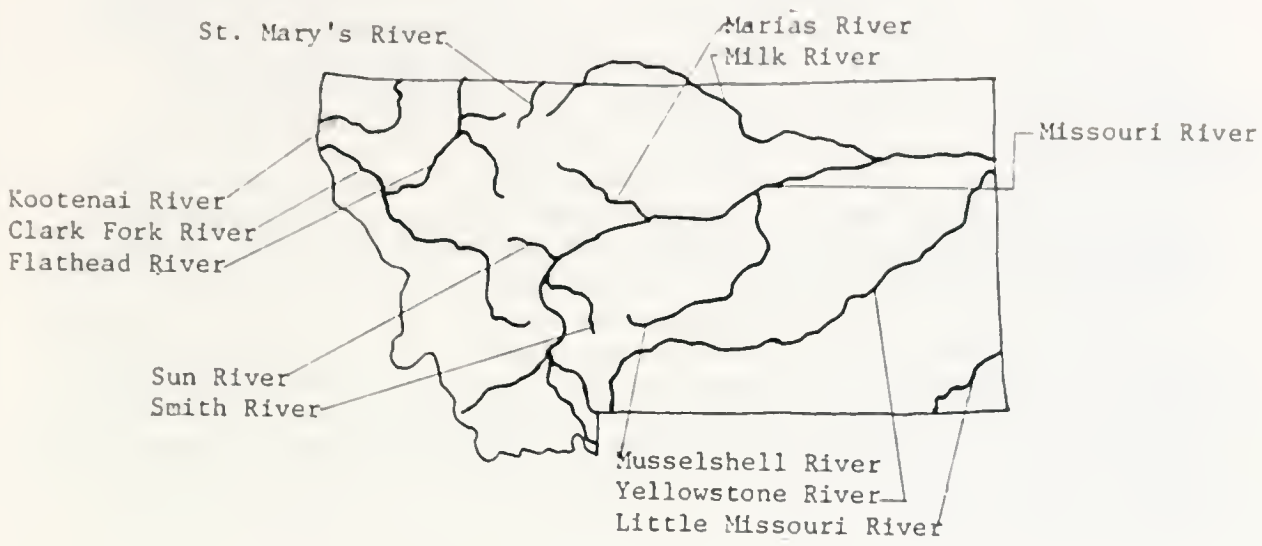
The assessment of pesticide problems has been confined to areas where accidents and misuse have been reported. A generic study of baseline conditions to determine the presence of pesticides throughout the state remains to be done. Air and soil sampling in control areas began in 1978 and 1979, and will continue in 1980, with new areas established as the equipment becomes available.

Summaries of available data by program area follow:

Water Quality

Montana has some of the highest quality water in the United States. This is exemplified by the fact many streams support excellent fisheries. The Montana DFWP in a recent inventory estimated that there are 10,181 miles of streams that are classified as being "substantial," "high priority" or "highest value" for fishery resources (Figure 2).

Figure 2 Major Streams and Basins



Montana, however, is not without its water quality problems. According to information compiled by the Montana Water Quality Bureau (WQB), DFWP and U.S. Forest Service (USFS), an estimated 4,015 miles of streams in Montana are being degraded by nonpoint source pollution and dewatering, and may not meet 1983 water quality objectives.

It must be noted that degradation does not necessarily mean a violation of Montana's Water Quality Standards has occurred, rather it means some beneficial use is being affected.

Nonpoint source problems are by far the most prevalent in Montana. Activities associated with agriculture, mining, urban development and silviculture are the most significant contributors. Of these activities, agriculture by virtue of its geographic extent, is the most prevalent. When considering the agricultural problems relating to nonpoint source pollution, stream dewatering due to irrigation, increases in salinity and sedimentation are the most critical. In a previous study by the DFWP, excessive irrigation withdrawals adversely affected fish in 285 stream segments. The most common water quality problem in Montana is sedimentation. According to the DFWP, 364 stream segments are experiencing sediment increases at some point due to channel alteration, bank encroachment and overuse by livestock.

Although logging of federally and corporately owned forests does degrade surface water, those operations are usually managed with the intent of reducing adverse environmental impacts. However, a major portion of Montana's forests, about 3.1 million acres, are owned by private, non-corporate land holders. Without strong silviculture management programs, future harvest could result in substantial water quality degradation.

There have been 133 water polluting mining operations (most are presently not being worked) identified in the Statewide 208 area alone. The exact extent of mining throughout Montana and its impacts are not fully known.

In an effort to constantly update the quality of water in the state's river basins, a water quality monitoring program has been in operation for several years. The present ambient monitoring network includes three permanent WQB stations and 13 U.S. Geological Survey (USGS) stations. Chemical and physical data are monitored monthly. This information is generally used to determine background and trend data that enable water quality personnel to ascertain which streams are not meeting the requirements for supporting aquatic life and recreational use. Periodically, intensive surveys are made when information is needed for permit reviews, construction or program planning.

Point source discharges degrade water quality, but the WQB has identified and requires permits for all known discharges. Major industrial discharges are sampled or inspected at least twice each fiscal year; while major municipal discharges are inspected or monitored at least once a year. A status report of the permits issued is included in the section devoted to permits.

Drinking Water

The initial Montana law relating to public water supplies was originally enacted in 1907. This law was revised in 1977 and again in 1979 to enable Montana to receive and retain delegation for administration of the "Federal Safe Drinking Water Act" (PL 93-523) enacted in 1974. Montana's program covered about 250 community water systems prior to 1978. The present program regulates all systems which have a least 10 service connections or serve at least 25 individuals daily for at least 60 days a year.

The current inventory, as submitted to EPA on January 1, 1980, listed 609 community water systems and 1,147 non-community water systems. The following presents the information available from the inventory for the community water systems:

Summary of Community Water Systems in Montana:

	No. of Water Systems	Population Served
Surface Water Systems:		
10,000 - 75,000 population	7	290,000
1,000 - 10,000 population	31	93,000
100 - 1,000 population	17	9,000
25 - 100 population	6	600
Total	61	392,000
Ground Water Systems:		
10,000 - 75,000 population	2	22,000
1,000 - 10,000 population	32	69,000
100 - 1,000 population	190	56,000
25 - 100 population	316	14,000
Total	540	161,000

Consecutive Water Systems:	No. of Water Systems	Population Served
10,000 - 75,000 population	0	0
1,000 - 10,000 population	7	13,000
100 - 1,000 population	0	0
25 - 100 population	0	0
Total	7	13,000

The surface water systems provide water completely or in part from surface sources. Consecutive water systems are ones that purchase all of their water from other water systems and do not have any sources of their own.

The table presents a number of interesting items, for example:

1. The largest community water system in Montana serves a population of 72,000 (based on the 1970 census). It is anticipated that the population figure will be higher at the completion of the 1980 census.

2. Only one percent of Montana's community water systems serve more than 10,000 persons. However, this one percent of the systems serves 55 percent of the people who obtain water from a public water system. The "small system strategy" currently under development by EPA will impact over 99 percent of Montana community water systems.

3. Fully 87 percent of Montana community water systems serve fewer than 1,000 persons. This 87 percent of the systems provides water to only 14 percent of the population obtaining water from a public water system.

4. Ten percent of all community systems are surface water. The systems supply water to 70 percent of the population. More than 88 percent use groundwater. One percent purchases water from another water system.

From a quality standpoint, Montana's drinking water is considered generally good in the western part. Those supplies in the eastern part, particulary groundwater, would be considered poor. The exception in the western part are the surface supplies which are high in turbidity. In the eastern part of the state, the communities using surface supplies with few exceptions, have water treatment facilities capable of providing quality water. However, the groundwater supplies are generally high in total dissolved solids. Some of the smaller supplies have fluorides and nitrates which exceed the maximum concentration limit (MCL). The following information identifies, on a statewide basis, the fluoride, nitrate, arsenic, selenium and turbidity problems in the state.

Community Public Water Supplies Which Exceed MCL's:

Supply	Constituent	Reported Level (mg/l)	Maximum Contaminent Level (MCL)
Ashland	Fluoride	3.9	2.4
Circle		5.2	
Lambert		4.1	
Richey		4.4	
Highland Park, Glendive		3.8	
Spring Grove Tr. Ct.		3.1	
Cheeks Tr. Ct.		3.8	
Alta Tr. Ct. Miles City		2.57	
Bills Trailer Ville		2.74	
Greenstar Mob. Hm Village		2.96	
Wagon Wheel Tr. Ct.		2.58	
W & R Mob. Hm Village Fairview		5.23	
Wagon Wheel Tr. Ct. Forsyth		5.5	
Flaxville	Nitrate	34.0	10.0 as NO_3-N
Rapelje		13.0	
Coffee Creek		14.0	
Denton		13.0	
Three Forks	Arsenic	0.06	0.05
Rapelje	Selenium	0.036	0.01

Community Public Water Supplies which utilize surface water and have exceeded the maximum contaminant level of 1.0 N.T.U. for a monthly average.

Culbertson
Bozeman
Canyon Ferry
Devon
Tiber County Water District, Conrad
Fort Peck
Rainbow Dam
Ryan Dam
Harlem
Helena (Ten Mile System)
Neihart
Ronan
White Sulphur Springs

Community Public Water Supplies which use surface water and do not monitor turbidity.

East Glacier
Hill County Water District, Hingham
Power
St. Ingatius
Sheridan
Troy

Nearly all of the community public water supplies are now monitoring for bacteriological quality on a regular basis and the maximum contaminate levels for coliform bacteria are rarely exceeded. Of 576 community supplies only about 15 have not yet begun a regular bacteriological monitoring program.

The inventory of noncommunity public water supplies was completed at the end of 1979 and about 40% of these supplies have begun taking bacteriological samples on a quarterly basis.

A program for radiological monitoring is now being developed and will be implemented over the next 1-2 years. This program will include all community supplies.

Construction Grants

A federal grant program was initiated in 1956 to assist municipalities in the construction of sewage treatment facilities. The State has assisted the EPA and predecessor agencies in administration of this program by establishing needs and priorities, and reviewing project applications and preliminary and final plans. Federal grants on projects have increased from 30 percent to 75 percent (85 percent where the project uses innovative or alternative treatment mechanisms such as land disposal) of eligible project costs.

Using the priority system developed by the WQB and approved by EPA, a priority list is drawn up at least once a year. Grant monies are then set aside for the top communities on the list.

The grant process is presently divided into three steps. Step 1, called facilities planning or Section 201 planning, is a detailed planning effort aimed at providing a recommended solution to a community's particular sewer and treatment problems. Included in this plan is: an analysis of the existing sewer system and treatment facility; a probe of the town's anticipated development and growth trends; a comparison of the economics and effectiveness of all treatment alternatives, and an environmental assessment of the solutions. Finally, the most cost-effective, environmentally sound and socially acceptable alternative is selected.

If the plan receives the approval of the reviewing governmental agencies, after local public participation and a hearing, a grant may be awarded to provide for Step 2 expenses.

Step 2 deals with the design and preparation of plans for the selected sewage disposal facilities. Following governmental approval of plans and specifications, a grant may be made to provide for Step 3 expenses. The majority of the project costs are associated with this step -- construction. For some projects, one grant may be given that combines steps 2 and 3.

Numerous delays have been encountered in the construction grant program since passage of PL 92-500 (Water Pollution Control Act Amendments of 1972). This act, in addition to providing greater federal funding, also required EPA to develop new regulations. PL 95-217 (Clean Water Act of 1977) again authorized additional monies and changed the requirements. The facility planning program must now go into much greater detail on alternatives, particularly land disposal options. It has taken consultants time to adjust to the new planning requirements, and states and EPA, therefore,

have fallen behind in their review. To help overcome this deficiency and provide for more state control, WQB has applied to EPA for a greater delegation of administration of the program made possible by Section 205 (g) of PL 95-217. The legislature has approved additional manpower (six positions) and authority. Pursuant to a delegation agreement signed during FY 1979, the State began hiring staff for this program on July 1, 1979.

The agreement identified specific activities to be performed by the State and EPA. It also identified the available and projected federal funds, Figure #3. Over a five-year period approximately 100 Step I, 150 Step II and 150 Step III grants must be awarded in order to utilize available funds for needy projects. This is an average of 20 Step I, 30 Step II and 30 Step III grants each year.

Wastewater Discharge Permit Program

Montana's wastewater discharge permit program began in 1968. With passage of Pl 92-500 (Water Pollution Control Amendments of 1972), a federal wastewater discharge permit program was also initiated. In 1974 Montana applied for and received authority from EPA to administer this program, thus minimizing duplication of effort. EPA established wastewater discharge limitations for the various categories. Where these limitations will not allow the meeting of water quality standards (including nondegradation of high quality waters by new discharges or existing industries), stricter limitations are imposed.

Tables #1 and #2 list the various categories of major and minor industrial wastewater discharges and their present status with regard to compliance and enforcement. Most of the projects shown as inactive have eliminated their discharges to surface waters and therefore, do not need a wastewater discharge permit.

Table #3 lists the status of the municipal discharges. Montana's five largest cities (Billings, Great Falls, Butte, Missoula and Helena) all have treatment facilities capable of meeting effluent limitations except for chlorine residual and fecal coliform bacteria. There are discharge limitations on chlorine residual because of its toxic effect on aquatic life, and meeting these limitations sometimes does not allow the municipality to meet the fecal coliform limits. Billings is presently experimenting with chlorination at the secondary clarifiers which may give acceptable results. Some coliform limits may be revised based on receiving stream flows and will still meet Water Quality Standards.

Many of the communities meeting discharge limitations still have treatment facility needs. For example, Helena, Kalispell and Missoula all need improvements to their sludge disposal systems. Helena and Kalispell have serious odor problems due to present sludge disposal practices, but are implementing land injection as an interim solution. The discharge standards for sewage lagoons were relaxed by EPA and, hopefully, this will allow many of the smaller communities to meet effluent limitations with a minimum amount of improvements.

It should be noted that essentially all dischargers (including those not in compliance) have constructed substantial treatment facilities during the last 25 years. The large percentage of noncompliance of major industrial dischargers versus the low percentage of minor dischargers is partially due to their more complex treatment facilities and greater bureau review on those that have the potential to do the most serious stream damage.

Figure 3
TOTAL FEDERAL FUNDS APPROPRIATED TO
MONTANA CONSTRUCTION GRANTS ($x10^6$)

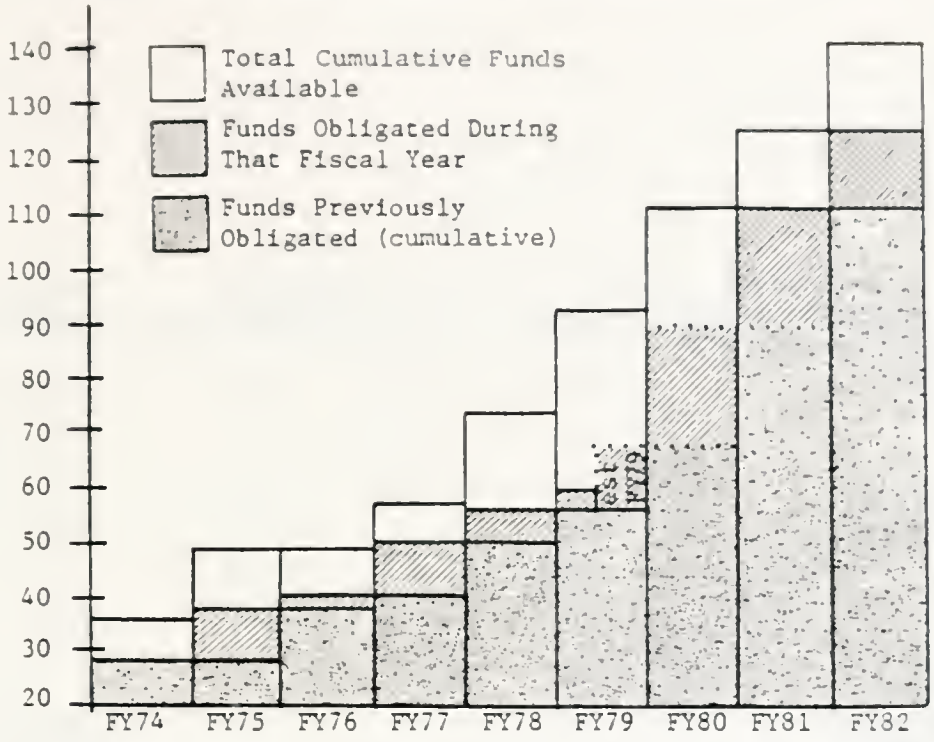


Table 1. Status of Major Industrial Wastewater Discharge Permittees

Category	Total No.	Active	Inactive	Substantially In Compliance	Not In Compliance	
Major						
Smelter	3	3	0	2	1	(see note 1 below)
Railroads	1	1	0	0	1	(see note 2 below)
Plywood Mills	1	1	0	1	0	
Oil Refineries	4	4	0	1	3	(see note 3 below)
Slaughter Plants	1	1	0	1	0	
Sugar Refineries	2	2	0	2	0	
Paper Mills	1	1	0	1	0	
Generating Plants	2	2	0	2	0	
Totals	15	15	0	10	5	

1. Anaconda-Warm Springs - Not meeting all permit limits, but with adjustments in pH control at Butte will probably meet limits.

2. B.N.-Livingston - Permit limit violations. Enforcement action taken. On schedule to comply by 7/1/80.

3. Exxon - Permit limit violations. Enforcement action taken. Compliance schedule submitted.
Farmers Union - Compliance schedule submitted, not met. Enforcement action pending.
Phillips Petroleum - Permit limit violations. Order sent.

Table 2. Status of Minor Industrial Wastewater Permittees

	Active	In Compliance	Not in Compliance	Notes
Minor				
Fish Farms	13	13	0	
Irrigators	0	0	0	Considered nonpoint sources under Federal legislation.
Feed Lots	88	88	0	See note 1 below
Oil Wells	7	7	0	
Mines	23	23	0	
Smelters	1	1	0	
Dairies	1	1	0	
Railroads	7	6	1	See note 2 below
Lumber & Plywood Mills	1	1	0	
Oil Refineries	1	1	0	
Highway Projects	26	26	0	
Sand & Gravel	3	3	0	
Slaughter Plants	0	0	0	
Cement Plants	2	2	0	
Chemical Plants	1	1	0	
Generating Plants	1	1	0	
Industrial Sewage Treatment Plants	8	8	0	Mt. Power Dam Plants
Miscellaneous	7	7	0	
Totals	190	189	1	

1. Includes 41 smaller feed lots active on state permit program, but not included as part of federal permit program.
2. Compliance order issued to BN Whitefish for recent permit violations.

Table 3. Status of Municipal and Federal Wastewater Discharges

	Substantially In Compliance		Not in Compliance With Secondary Treatment Standards	
Sewage Treatment Facilities	Major	Minor	Major	Minor
Municipal & State	9	75	16**	50
Federal & Indian	-	30	1	4
Totals	9	105*	17	54
Water Treatment Facilities Wastewater Disposal				
Municipal	-	10	-	4
Federal & Indian	-	1	-	0
Totals		11*		4

*About 1/2 of these have no surface water discharges.

**Enforcement Action against Bozeman by EPA in Federal District Court.

Looking to the issuance of new permits, the WQB expects many applications from new mining operations, most of which will be for high quality waters. There will also be applications from saline seep areas for discharge of saline waters. It is highly unlikely that many of these saline discharges will be allowed, due to their potential impact on surface waters. There will also be several permit applications for highway contractors to pump water from forms used in bridge pier construction. Applications are expected from new energy developments such as power plants, synfuel plants, and alternative energy sources as well.

The WQB's major jobs in the permit area will be assuring that permittees are complying with existing permits, and to get the new applications processed. As an aid in processing large numbers of applications in such categories as bridge cofferdams, suction dredge mining, and feed lots, the WQB is attempting to develop general permits in these areas.

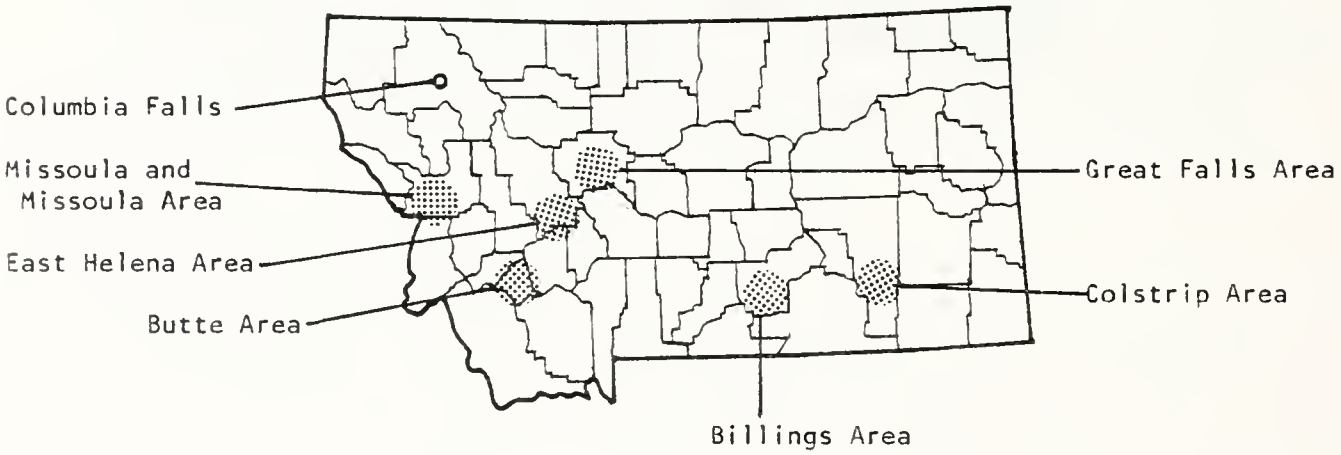
Air Quality

The Big Sky Country is truly what its name implies, yet there are places where the quality of air is a fragile resource. The plains east of the Rocky Mountains provide few obstructions to the sea of air that flows across the land, but in western, southern and central Montana, where various mountain ranges form valleys, air sometimes is trapped in layered inversions, causing degradation.

In addition to inversions, man also plays a part in altering air quality. In urban areas throughout the state, such things as street dust, smoke from fireplaces and industrial emissions contribute to lowering air quality and visibility. In rural areas the largest contributors to air quality degradation are unpaved roads and mining operations.

An assessment by the Air Quality Bureau (AQB) of air quality throughout the state revealed the following information:

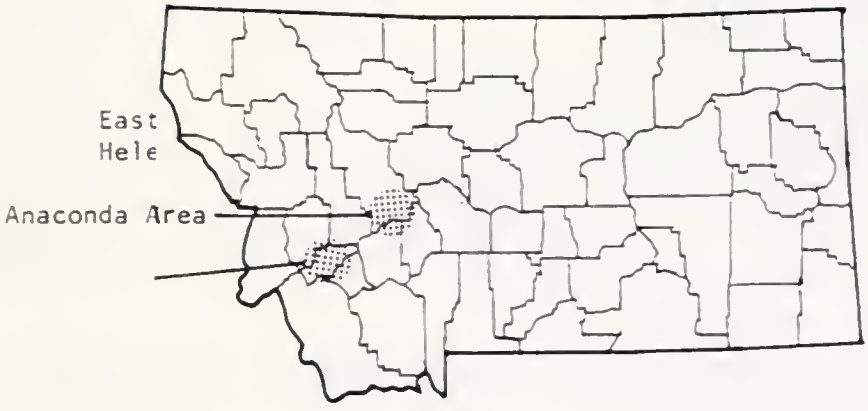
TOTAL SUSPENDED PARTICULATE



Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Colstrip Area	X		Street Dust and Strip Mining
Columbia Falls	X		Street Dust
Missoula	X		Street Dust, Smoke From Fireplaces and Industry
Missoula Area		X	Unpaved Rural Roads and Industry
Billings Area		X	Street Dust
Great Falls Area		X	Street Dust
Butte Area	X*		Street Dust and Mining Operation
East Helena		X	Street Dust and Industry

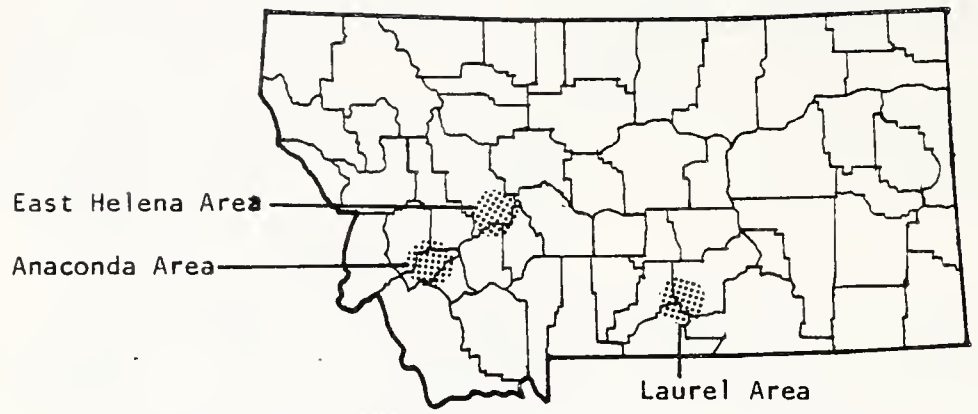
*EPA designation replaces state designation

Lead



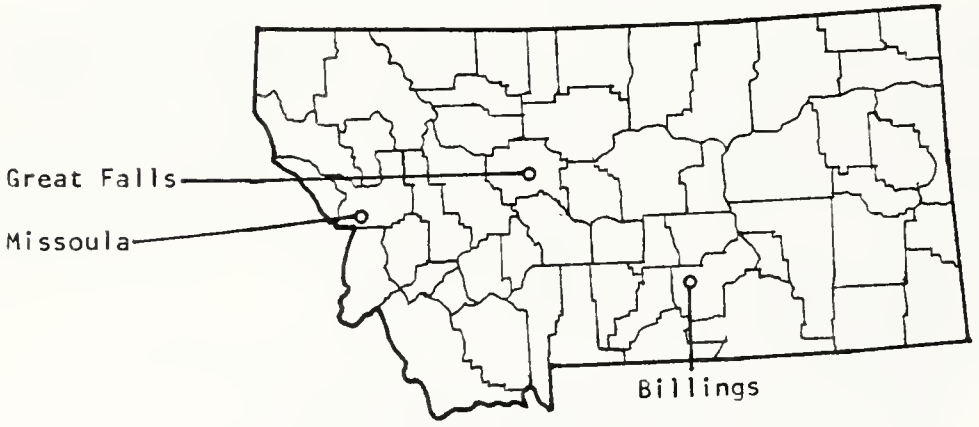
Designated Area	Does Not Meet Primary Standards	Reasons
East Helena Area	X	Smelter
Anaconda Area	-	Smelter - Still Being Evaluated

SULFUR DIOXIDE



Designated Area	Does Not Meet Primary Standards	Does Not Meet Secondary Standards	Reasons
Laurel Area	X		Refinery
East Helena Area	X		Smelter
Anaconda Area	X		Smelter

CARBON MONOXIDE



Designated Area	Does Not Meet Primary Standards	Reasons
Billings	X	Exhaust From Motor Vehicles
Missoula	X	Exhaust From Motor Vehicles
Great Falls	X	Exhaust From Motor Vehicles

Only the towns and areas mentioned do not meet primary or secondary air quality standards, the rest of the state presently meets the standards. Additionally, the entire state meets the standards for photochemical oxidants and nitrogen oxides.

Solid Waste Management And Hazardous Waste Disposal

The disposal of solid wastes has become a major, complex problem in Montana. Due to its complex nature it also relates to air, water and land pollution. In the future, the solid waste problem will become more expensive, expansive and complicated. It is becoming clear that concerted efforts of all levels of government, as well as the private sector, must be employed to ensure proper waste management.

Our society consumes enormous quantities of material and energy which in turn generates an exceedingly large volume of waste. Currently, approximately 600,000 tons of municipal solid waste are being generated per year in Montana, and given the well-established waste generation rates, by 1990 nearly 870,000 tons of waste will be generated per year. This waste is being disposed in more than 250 identified municipal disposal facilities and numerous undisclosed indiscriminate dump sites.

In addition, from state surveys it has been established that approximately 200,000 tons of potentially hazardous wastes are generated each year in Montana. This volume of hazardous waste includes pesticides, heavy metals and other industrial chemical wastes. Furthermore, a large number of "empty" pesticide and other toxic chemical containers of all sizes are discarded annually.

The state now possesses sufficient regulatory authority to control solid waste disposal. As required by the 1977 "Montana Solid Waste Management Act," the Solid Waste Management Bureau (SWMB) currently is licensing all solid waste management systems in the state. This licensing procedure assures that all such systems will provide a basic public service and not degrade the environment. To date, a total of 147 waste management systems have been licensed by the bureau.

In response to action taken by the 1977 Montana Legislature, the SWMB is providing both technical and financial assistance to local government entities for the development of waste management systems.

Legislative amendments enacted in 1977 give the DHES control over hazardous wastes, including licensing authority for hazardous waste transporters. Also in 1977 the SWMB published a survey of hazardous waste generation, storage, treatment and disposal. This survey included 236 industries as well as other generators of hazardous waste, such as hospitals, pesticide users and septic tank service companies. The bureau is now developing its hazardous waste program, but will not begin licensing hazardous waste facilities until FY 1981.

Currently no licensed hazardous waste disposal facility is located in Montana. This situation does not pose an immediate problem because of the availability of such sites in neighboring states. However, with the inauguration of a statewide hazardous waste program the difficult task of siting a hazardous waste disposal facility may have to be initiated in Montana.

The bureau has given and continues to render technical assistance to local governments, businesses and small industries concerning hazardous waste management needs and problems. Possible alternatives for collection, storage and disposal of small quantity hazardous wastes are presently being evaluated. Special arrangements for wastes from laboratories, retail establishments, pesticide users and small industrial generators may be necessary to alleviate the burden of hazardous waste disposal in sanitary landfills and to prevent illicit hazardous waste disposal.

A number of instances of improper waste management have been investigated in the last few years. The SWMB has begun to establish a working relationship with the industrial community which may be regulated under the forthcoming hazardous waste regulations.

Pesticides

Montana is primarily an agricultural state and as such requires the use of pesticides to help manage a multitide of pest problems. Based on data collected from commercial applicators (1978), it is estimated that from 2.8-3 million acres are treated commercially each year. There are no accurate statistics available for private applicators, but generally the private applicators treat smaller acreages, do spot treating, and field margin treating. In most years, private applicators would probably apply pesticides to 1.5-2 million acres.

The Environmental Management Division, DOA, has a responsibility to serve Montana's agriculture, but is also mandated to protect the environment and the health of the state's citizens. To do this, the use of pesticides must be closely monitored. Toward this end, the Environmental Management Division administers a pesticide applicator certification program and an enforcement program. Both programs are now administered by the Enforcement Division of EPA to achieve consistency and continuity of purpose between the two programs. Since their inception, the programs have significantly reduced the amount of pesticide contamination in Montana despite the fact that the number of certified commercial and private applicators has increased significantly since 1976 (Figures 4 & 5).

Recertification of some of the categories of commercial applicators was implemented this year. Credit is given to the applicators and dealers for each course they attend so that they can accumulate 100 points during the four-year recertification period (Figure 6).

The basic elements of the pesticide programs include education, enforcement, monitoring and sampling.

Several fish kills in the state (1979) resulted in the promulgation of regulations restricting the use of aquatic herbicides through 1981. Inspections of aquatic applicators and enforcement of these regulations will be a priority item during this grant period.

In the area of education, efforts will be made to assist private applicators to do a better job in the areas of safety, calibration and disposal. Appropriate enforcement actions will be taken on violations.

Figure 4

Figure 5

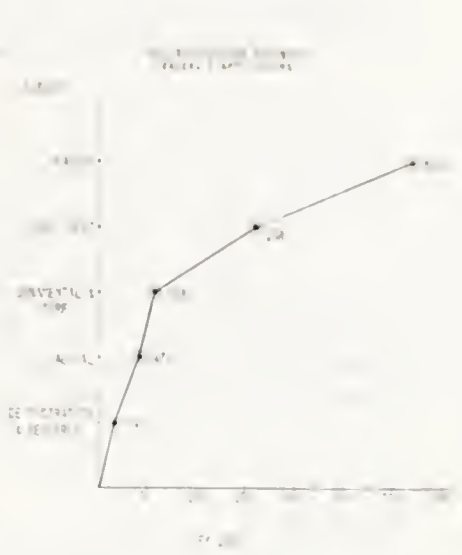


Figure 6

The recent recurrence of energy-related problems has resulted in an increase in practices such as no-till and chemical fallow management systems. Monitoring of soil and plant residues will be conducted.

Efforts in the areas of monitoring and sampling are currently concentrated in establishing basic information concerning the consequences of spray drift on urban areas and establishing a network of control plots throughout the state.

An air monitor was set up in the Flathead Lake area to determine the amount of aerial drift that occurs during the annual spraying for fruit crop and potato pests. The information derived from the monitoring will give DOA personnel a basis for ascertaining the effects of the spray on residential and urban areas over a several year period.

Several test plots have been established in the state to provide baseline information on the effects of pesticides in the environment. Soil and air samples from each site will enable DOA personnel to determine concentrations of pesticides, and will give them something with which to compare future samples.

Radioactivity

Elevated levels of radioactivity are currently being studied in two parts of Montana by State and federal agencies.

The DHES has been studying elevated radioactivity in water wells and geothermal springs in the Alhambra area since it was discovered in 1976. The latest studies by the DHES and U.S. Geological Survey have been suspended while the State turns its attention to the recently discovered elevated levels of radiation in the Butte area.

The DHES has independently been investigating the radiation levels in Butte for more than two years. Although a variety of studies are still in progress, it appears that the elevated radiation levels are due to a combination of natural and displaced radioactive materials.

Although the DHES studies have been funded by the state, EPA has assisted in the effort by sending a radiation scanner van to Butte for several days, loaning the DHES indoor radon sampling units and flying over the area with radiation detection equipment.

In addition, the EPA has provided the DHES with the loan of both gamma and radon progeny detection and measuring equipment. Through its Las Vegas laboratories, the EPA has given extensive technical support in the forms of laboratory radioanalyses and supplying and reading dosimeters used to measure radon progeny concentrations.

Toxics

Asbestos

A voluntary program for the detection and correction of potential health hazards due to deteriorating friable asbestos was begun by EPA in the spring of 1979.

The Montana EPA office with support from the Region VIII office has distributed information concerning the asbestos in schools program. A contract person detailed to the Denver EPA office visited schools in Helena, Missoula, Great Falls, and Billings during the summer of 1979. Some on-site inspections were made to determine the presence of friable asbestos.

Federal legislation requiring the correction of health hazards created by friable asbestos in schools and public buildings was signed by the President this year. Compliance will be mandatory at some future date. Financial assistance will be provided where remedial measures are required.

The State Air Quality Bureau will provide analysis of samples sent to Helena at no charge. The Region VIII office again has contract support available to assist in providing information to schools and to perform on-site inspections. This resource will be made available during FY 81.

Disposal of asbestos containing materials will be coordinated by the State Solid Waste Management Bureau (SWMB). The SWMB will designate a site or sites that have adequate operation and maintenance practices to provide protection of public health and the environment.

Polychlorinated Biphenyl (PCB)

The EPA sent copies of the Federal Register that discusses disposal and marketing of PCB to all known persons and businesses that use PCBs in Montana. The EPA plans to continue to inform, sample and help mitigate PCB problems. A seminar was held to inform the public and private sectors of EPA regulations.

Fiscal Year 1980 Accomplishments

The following information reflects major state or EPA accomplishments during FY 1980:

Water

Wastewater Discharge Permit and Enforcement Program

- A backlog of approximately 60 expired permits was eliminated, not including 40 permits for small feed lots.
- Approximately 90 new permits were issued.
- Approximately 110 complaints were received and processed.
- Fourteen Violation Report Forms were sent to the DHES Legal Division requesting assistance.
- Eight Notices of Violation and Orders to Take Corrective Action were issued.
- Four civil complaints, including requests for assessment of civil penalty and corrective action, were filed.
- Four civil complaints were settled, resulting in corrective actions and collection of $19,800 in civil penalties.
- One complaint with a civil penalty is pending resolution.
- Approximately 120 preliminary enforcement letters were sent and included notices of violation of permit requirements and requests for corrective actions.
- In approximately the last four years the enforcement program has resolved 13 actions resulting from episodes which were significant enough to prompt the filing of civil complaints, including requests for assessments of civil penalties.
- Total civil penalties collected to date amount to $146,650.
- The enforcement program has initiated actions which resulted in the issuance of 52 administrative notices for abatement, corrective measures, injunctions and orders to show cause.

Water Quality Management Planning

- Statewide 208 plan approved.
- Water quality management agreements signed with BLM and USFS.
- Conservation Districts prepared and submitted to WQB water quality management plans.

- Six water quality tours were conducted in cooperation with Conservation Districts.

- Muddy Creek project manager hired and water quality monitoring program initiated.

- Prickly Pear Creek reclamation effort initiated.

- Numerous public information and education activities.

- 305 (b) report completed.

- Northwest Loop biological monitoring report completed.

- Musselshell River Physical Features Report completed.

- Five Valleys Region Water Quality Report completed.

- MSU Subdivision Groundwater Study completed.

- Developed waste discharge permit process for saline seep drainage.

- Benthic biological/salinity study completed for USGS and BLM in the southern Fort Union Region of Montana.

- Revised Water Quality Standards drafted and public hearing held.

- Prepared draft non-degradation rules.

Construction Grants

- Full staffing with the exception of Clerk/Typist.

- Substantial delegation (except Step 3 inspections, constructability/ biddability) inclusive of clerical tasks and preparation of preliminary environmental assessments.

- Total obligations of 17.2 million dollars.

- Initiation of monthly WQB/EPA training sessions.

- FY 1980 Priority List was revised.

- State received a variance from Bureau of Economic Analysis population projections and the statewide projection was disaggregated.

Drinking Water

The inventory of small community and noncommunity public water supplies (PWS's) has been essentially completed. Follow-up inspections have been made on most of the public water supplies inventoried.

The inventory of public water supplies has been stored on the Model State Information Service computer system along with all the chemical data on each PWS.

Chemical analyses have been completed on nearly all community PWS's. Nitrates have been done on about 50% of the noncommunity PWS's.

Assistance was given to PWS's having operational problems.

Regulations regarding plan review have been revised (but not yet presented to the Board of Health).

A complete new system of record keeping has been put into effect.

New enforcement procedures have been initiated. Enforcement actions have begun against communities which appear to be willfully violating drinking water regulations.

Nearly all community PWS's have been placed on regular bacteriological sampling programs. Approximately 400 of the noncommunity supplies are also on sampling schedules.

Air

The AQB processed 105 construction permits to assure that new air pollution sources comply with all air quality rules and standards. The bureau performed 17,250 laboratory analyses on 4,150 samples to evaluate the effects and levels of air pollution. It analyzed 149,000 hourly field samples to investigate the air pollution levels throughout the state.

The AQB enforced compliance with air quality rules through 150 field surveillance actions.

Montana's ambient air monitoring network was reviewed.

Solid Waste

Hazardous Waste Management

The SWMB currently is developing draft revisions of the administrative rule for the "Montana Solid Waste Management Act." It is contemplated that by October the rule will be revised and adopted by the DHES. These modifications will put Montana's regulations substantially in accord with federal regulations and place the state in the position to apply for interim authorization from EPA. In conjunction with the advancement of necessary regulatory authority, the bureau has initiated the development of required procedures for maintaining a state hazardous waste management program. These procedures include a manifest system to track hazardous wastes from their generation to disposal, a permit priorities mechanism and a surveillance/enforcement program.

During the past year, the bureau was extensively involved in the Pierce Packing Company PCB incident. This included the coordination of disposal for contaminated foods, feed and livestock and the maintenance of records on destruction/disposal. In addition, bureau staff worked with EPA in establishing standard practices and guidelines for disposal. The bureau verified 169 disposal actions involving 114 feed companies and livestock producers.

Continued surveillance has been maintained of the Department of Livestock's scabies control program. This program has disposed of approximately 150,000 gallons of toxaphene solution at 16 different locations.

Continual efforts have been made to refine the state emergency response program especially with respect to developing internal response procedures and equipping the team.

Specific disposal problems and sites have been evaluated in seven cases involving industrial waste disposal.

Solid Waste Management

As of June 1, 1980, the bureau issued 147 licenses to solid waste management systems throughout the state. Of these licenses, 93 are permanent and 54 are conditional. This licensing process is being utilized extensively to gather baseline data for the open dump inventory.

In addition, the 1977 "Solid Waste Management Act" allows the bureau to issue state grants to local government entities to conduct detailed areawide waste management planning. The planning grant program has encompassed more than 40 percent of the state. This planning effort is of considerable assistance in conducting the open dump inventory. Currently, completed inventories have been made on 15 disposal sites.

State statute has required the bureau to develop and implement a comprehensive solid waste management plan. This plan has been completed and adopted according to state laws. During the last few months, bureau staff have spent considerable time, with the cooperation of the state EPA office, in preparing modifications in that state plan. It is anticipated that a revised state plan will be finalized and submitted for EPA approval before October 1, 1980.

Pesticides

The Montana DOA accomplished the following EPA funded program activities by April 30, 1980 and projects the end-of-year accomplishments.

	Mid-year FY 1980	End-of-year FY 1980
Dealer Stock Inspections	87	188
Formulation Plants	3	3
Pesticide Applicator Inspections	214	360
Commercial Applicator use observations	14	50
Market place Inspections	71	600
Pesticide accident Investigations	2	60
Special Investigations	2	6-10
Efficacy Studies	6	10
Private Applicator Survey	--	360
Private Applicator use observation	--	40
Collection and Analysis of Samples:		
Formulation		
Samples	310	330
Analysis performed	721	--
Residue		
Samples	144	250
Analysis performed	468	--
PCB and pesticide samples received from EPA	79	100

Updated Quality Assurance Manual for Pesticide Analysis.

Installed and trained personnel in the use of the GC/MS system for confirmation analytical work.

Developed new analytical techniques for analysis of various biological and environmental samples.

Certification Training	
Commercial applicators (new)	43
Private applicator (new)	449
Continuing Certification Training	
Dealers	320
Seed Treaters	158
Aerial applicators	47
Demonstration and Research	14
Ornamental and Turf	58

Related Pesticide Activities

The Environmental Management Division of DOA provides pest management services to producers, industry, government agencies and the general public. These services include establishing integrated pest management programs for specific cropping systems, recommendations on use of pesticides, identification and surveillance of pests and the evaluation and resolution of the effects of pesticides on agriculture and the environment. The division also registers 3,100 pesticide products prior to their use in the state: licenses 740 pesticide dealers; licenses 1,350 applicators and their employees (300); licenses 8,886 private applicators; and regulates the sale of pesticides at the retail level. These services are provided by personnel located in Helena and in the six district field offices. The department's laboratory provides analytical regulatory and service analysis to other departmental programs and to the general public. Thus, a more comprehensive pesticide regulatory and service program is provided to Montanans by combining the state and federal pesticide laws and pest management laws than would be provided by each program separately.

Radiation

A year's data regarding radon daughter concentrations was completed in approximately 150 Butte homes utilizing Radon Indoor Progeny Integrating Sampling Units (RIPISUs) supplied by the EPA.

Radon daughter concentrations in approximately 1000 Butte homes and 100 Anaconda homes were estimated by use of the grab sample method.

The area of Butte primarily affected by elevated radon and radon daughter concentrations was identified and mapped.

The effectiveness of air cleaning devices were studied to determine their usefulness for reducing indoor radon daughter concentrations.

Hazardous Wastes

The Asbestos in Schools Program was established. Guidance was given to all school districts during implementation.

National Environmental Policy Act (NEPA)

In meeting EPA's review responsibility under NEPA, the following EIS's were reviewed:

- Colstrip 3 and 4
- Northern Tier Pipeline
- ASARCO Troy Mine
- Kootenai Falls
- Spring Creek Mine
- Numerous Forest Service P.U.'s
- Numerous BLM Projects
- Missouri Breaks Grazing

In an effort to identify potential environmental issues and remove assessment deficiences related to the construction grants, program conferences were held with Bozeman, Missoula, Hamilton, Bridger Bowl and Kalispell.

Toxics

EPA has developed an integrated toxics strategy. The state has assisted in determining which chemicals are to be considered in the strategy and which federal facilities in the state should be examined through this program.

The integrated strategy was tested in the summer of 1979 when the chemical PCB -- polychlorinated biphenyls -- leaked from a broken electrical transformer into animal meal prepared by the Pierce Packing Co., Billings, resulting in a united effort by EPA and states in Region 8 to trace the extent of the contamination and take corrective actions.

EPA's Montana Office worked closely with state officials to identify contaminated livestock and feed, then monitored the safe disposal of both. Steps were also taken to safely dispose of the source of contamination.

The result of the Pierce Packing episode prompted the EPA to conduct a PCB Industry Seminar in Helena in the fall, followed later by a two-day seminar sponsored by the DHES and Interagency Regulatory Liaison Group (EPA, Food and Drug Administration, U.S. Department of Agriculture and Consumer Product Safety Commission). Both were instrumental in educating Montanans and people from throughout the region in how to identify PCB sources and what to do in emergency situations.

Public Participation

Public participation implemented for FY 81 was sought by a questionnaire to state and local governments, public interest groups and private citizens. The questionnaire requested participants indicate their desired involvement in five categories of the environmental decision-making process. Approximately 200 responses to the questionnaire disclosed the following results:

List of selected priorities	158
Draft Montana/EPA Agreement	156
Final Montana/EPA Agreement	194
Participation in a public meeting	51
Survey to determine priorities beyond FY 81	79

In addition to sending interested persons and parties a list of the priorities and the draft and final MEA , a survey was conducted in September to involve the public in helping determine the priority issues for the FY 1982 MEA.

PRIORITIES

1. Water

Total delegation to the DHES of the administration of the municipal construction grant for sewage treatment (205 (g)) program.

Development of an instream flow strategy which addresses water quality concerns.

Continued improvement of the record management system used in the Water Supply program including a maximum contaminant level compliance review process and follow-up enforcement action.

Timely issuance and reissuance of permits and initiation of necessary enforcement actions to insure compliance.

2. Air

SIP Implementation and Development

- Anaconda sulfur dioxide (SO_2)
- Missoula carbon monoxide (CO)
- East Helena Lead

Source Surveillance

- PSD and new source review
- Inspection of A-1 (Class A) Sources
- Emission Inventory Update

Monitoring

- Implement National Air Monitoring Station (NAMS) and State and Local Air Monitoring Station (SLAMS) Networks
- Operate Quality Assurance Program
- Audit continuous emissions (CE) monitors
- Audit quality assurance (QA) programs for company-owned monitors

3. Solid Waste Management

Development and implementation of a comprehensive state hazardous waste management program.

Closing or upgrading of existing open dumps by the implementation of the State Solid Waste Management Plan and application of appropriate state regulations.

4. Pesticides

Maintaining and improving the established quality of the pesticide enforcement and laboratory program with appropriate analysis.

- Perform inspection of all phases of pesticide manufacturing and uses throughout state.
- Approve, inspect and monitor aquatic herbicide applicators and applications.
- Provide direct assistance to private applicators in the problem areas of safety, calibration and disposal.

Maintain the established pesticide certification and training program.

5. Radiation

Butte Radiation

- Reduce radon levels in dwellings in Butte.
- Implement study to determine contributing factors to elevated radiation levels in Butte.
- Implement study utilizing passive track etch dosimeters to determine soil radon exhalation rates and to accomplish long term measurement of indoor radon concentrations.

RESOURCE SUMMARY FOR MONTANA-EPA PROGRAMS

The resource summary for all Montana - EPA programs (or media) is shown on the Resource Summary Table (Table 4). Following this table, each program is discussed. The highest priorities within each program are emphasized in the narrative discussion. Detailed work plans which specifically address all program elements within a medium follow the narrative.

TABLE 4

RESOURCE SUMMARY TABLE

Program	Federal Grant $	State Resources $	State Work Years	Federal Work Years
Air				
State 105 grants	550,000	394,714	32.34	3.8
Water Quality				
Water/Wastewater Opr. Cert.	0	14,982	0.5	
State 106 Grants	330,000	91,000	13.2	2.4
Section 208 Grants	376,868	69,000	8.18	1.4
Clean Lakes Grants	332,000	275,000	0.25	.35
205(g)	331,000	0	10.5	3.2
Drinking Water				
State PWS Grants	323,600	107,000	10.5	
State UIC Grants	74,200			1.1
Solid Waste and Hazardous Waste Grants	212,000	13,520	5.6	2.4
Pesticides				
State Enforcement Grants	450,000	107,541	21.55	1.2
State Cert. Tr. Grants	20,000	20,000	1.02	.05
Radiation	81,804	0	2.6	0.3
Categorical Programs				
Noise	27,272			
Toxic Substances				
Indians	180,000			
Flathead Study	355,000			
Federal Activities EIS Review				
Emergency Response				
Quality Assurance				

PRIORITY ACCOMPLISHMENT STRATEGIES

Air

- Implement SIP
- PSD
- Air Quality Monitoring
- Transportation Control Plans
- Development of State Implementation Plan For Lead

Water

- Wastewater Discharge Permit And Enforcement Program
- Drinking Water
- Instream Flow Activities
- Construction Grants

Solid Waste

- Hazardous Wastes
- Open Dump Inventory
- State Plan Revision
- Facility Planning And Implementation

Pesticides

- Enforcement
- Certification

Radiation

- Butte Radiation Program

PRIORITY ACCOMPLISHMENT STRATEGIES

AIR

Implement SIP

All nonattainment plans except the Missoula carbon monoxide (CO) plan were essentially approved in FY 1980. The approval for Missoula will come during FY 1981. Therefore, the work done in 1981 will be important towards achieving attainment of the National Ambient Air Quality Standards by 1982. Goals outlined for 1981 must be met if attainment is to be achieved by 1982.

A part of SIP implementation is the state's compliance and enforcement program for stationary sources. Continued emphasis will be placed on major source inspections since the Clean Air Act no longer allows for continued noncompliance of major sources through variance procedures. Significant violations by major sources in most instances will have to be dealt with through court actions and, if appropriate, by the imposition of noncompliance penalties.

PSD

Montana did not receive PSD delegation during FY 1980 from EPA. However, prior to delegation, EPA and Montana will enter into an interim agreement which essentially provides for Montana to perform the PSD analyses.

As part of the permit requirements, industries will be required to conduct baseline monitoring and diffusion modeling relating to their proposed activities. The Air Quality Bureau will be required to review the proposed monitoring networks and modeling techniques as well as the results of those efforts. This could take considerable time since each permit will require much public involvement and could result in a considerable amount of controversy both technical and political. Supplemental EPA financial and technical assistance will therefore be essential to meet these added needs and to insure the successful implementation of the PSD program.

Following promulgation of a visibility regulation by EPA (as required by Section 169A of the Federal Clean Air Act) the state will adopt a rule to deal with visibility requirements in Class I areas.

Air Quality Monitoring

The accurate measurement of Montana's present and future air quality plays an important role in existing and future SIP revisions. The location and impacts of new sources and proper technical and impact analyses are essential for the continued protection of Montana's pristine air quality and to accommodate orderly industrial growth.

The state has completed a review of its air monitoring program and has prepared and submitted a Network Review Report to EPA. Modifications to the existing network will be carried out according to the schedules set forth in that report.

Transporation Control Plans

The transportation control plans for the Billings and Missoula areas are being developed to determine attainment of the air quality standard for carbon monoxide. A schedule for updating the plans has been developed. Upon completion of the necessary work, the plans will be resubmitted to EPA.

The Billings plan requires updating emission factors. In addition, the Billings City-County Planning Agency has develped some traffic information which it feels may affect the modeling results. Consequently, the modeling will be done again using this revised data. Whether or not the control strategy has to be revised will depend on the outcome of the modeling. If the modeling shows higher levels of CO than the initial modeling effort, it may be necessary to revise the proposed solution to the problem; otherwise the original control strategy should be adequate.

In Missoula, both the modeling data and the model itself are suspected of being inadequate. In addition, there is speculation that Missoula may have a CO problem in the winter months which is attributable to wood stoves and fireplaces. The modeling for the transportation related problem will be redone and the control strategy revised as appropriate. An additional CO monitor has been provided to the Missoula Air Pollution Control Agency to investigate the possibility of areawide problems.

The Federal Highway Administration, the State's Department of Highways and local planning agencies must be involved if SIP strategies are to be completed in an expeditious manner. Because of the long time delays in implementing transportation changes, the process began in early 1980, with completion scheduled for 1982. Regular meetings among the involved groups will be held to insure communication and progress.

Assuming that Great Falls is designated nonattainment for CO, in all likelihood a local governmental agency will have the responsibility to develop the control plan for achieving attainment of the standards. A close working relationship between the Air Quality Bureau and the designated planning agency will be maintained to insure timely development and implementation of a plan, should one be required.

Development Of State Implementation Plan For Lead

Based on EPA requirements, lead implementation plans will be developed for the East Helena and Anaconda areas. Both plans will be developed under contracts using EPA funds. Major contract activities will include development of an inventory for stack and fugitive emissions, followed by modeling of the emissions. Hi-volume sampling data indicate violations of the National Ambient Air Quality Air Standard for lead in East Helena, but no violations have been recorded in the Anaconda Area. The implementation plan is required for Anaconda because of "potential" lead emissions from the Anaconda Company smelter.

WATER

Wastewater Discharge Permit and Enforcement Program

The general priority of the Montana Pollutant Discharge Elimination System (MPDES) is to administer and enforce an effective wastewater discharge

permit program. This is an ongoing program in which permit applications dischargers are reviewed and, if appropriate, permits are issued. Major dischargers which have the greatest potential to affect public health or substantially affect the quality of a stream receive the highest priority in the program. The minor dischargers, most of which can affect a stream locally, are also important and receive review, but not as detailed as major dischargers. However, because of their large numbers, minor permits do consume large amounts of time. This might be somewhat alleviated if certain of these categories can be handled by general permits. The DHES intends to pursue that possibility.

Self monitoring reports are required to be submitted by all dischargers for review by the WQB. Compliance monitoring of major dischargers is performed by the bureau at a frequency necessary to assure accurate results. The minor dischargers are compliance monitored when it is apparent that analyses may be in error or the discharger is out of compliance with its discharge limitations. Support is provided by the DHES Laboratory Division in the analyses of samples. Inspections of treatment facilities are also performed to assure adequate operation of facilities. Investigations are also made when complaints are received on permittees or where possible violations are occurring by persons not having a permit.

Compliance schedules are set forth for those dischargers not meeting minimum effluent limitations established by EPA as stream standards are violated. For municipalities the compliance schedules are coordinated with the WQB Construction Grants Section so the projects which are creating the biggest problems are given the highest priority for federal funds. Input from the SWMB will be provided to assure that residual wastes are properly handled.

Enforcement action is taken where effluent limitations are exceeded; self monitoring reports are not submitted as outlined in the wastewater discharge permit, or compliance schedules are not met. Enforcement may be in the form of a letter from the WQB, a compliance order issued by the department or a district court action to seek compliance and a monetary penalty where warranted. Support is received from the DHES Legal Division and the regional EPA office on enforcement.

Specific Priorities:

- Issue, reissue or modify major permits ensuring that water quality standards are met; toxic criteria limitations and pretreatment requirements are met; toxic criteria limitations and pretreatment requirements are imposed; residual wastes are handled appropriately (input from SWMB to be provided) and approprate effluent limitations and self-monitoring are provided.

- Issue, reissue or modify other permits.

- Pursue general permit issuance for such categories as bridge project cofferdams, small placer mining dredges, storm water, feed lots, and sewage lagoons.

- Process 6 (g) authorizations and Water Quality Standard (401) certifications.

- Provide timely complaint response and followup.

- Provide compliance monitoring twice yearly of all major industrial permittee discharges and once yearly for 10 major municipal dischargers.

- Compliance monitor 10 minor dischargers where self-monitoring data is suspect - provide a quality assurance program to assure appropriate laboratory results.

- Provide appropriate enforcement and report to EPA, giving priority to major dischargers.

- Provide timely review and appropriate notification on self-monitoring information.

- Inspect all major dischargers and 50 percent of minor dischargers yearly using appropriate report forms.

- Pursue delegation for permitting federal facilities.

- Assist in training enforcement and compliance personnel (EPA).

The Clean Water Act enacted in 1977, allows the states administering the Federal Wastewater Discharge Permit Program to have permitting authority over federal installations. The WQB has applied for this authority. EPA will still be responsible for dischargers on Indian reservations except in incorporated municipalities.

The Clean Water Act requires states administering the permit program to adopt a pretreatment program which will control certain discharges to municipal systems. The WQB is attempting to develop a reasonable pretreatment program which can be feasibly implemented in Montana.

Safe Drinking Water Program Implementation

The inventory of public water supplies (PWS) in Montana was considered to be completed by December 31, 1980, with the most recent total showing 609 community water systems and 1147 noncommunity water systems. To date, nearly all the WQB's efforts have been expended to bring community PWS's into compliance and very little time has been devoted to the noncommunity supplies. At this point there are some community supplies which are still not in compliance and it is our aim to correct as many as possible in the next fiscal year. At the same time the WQB will begin to shift its emphasis to the noncommunity supplies. The bureau has started a program to inform them of their responsibilities under the Safe Drinking Water Act and approximately 40% have been placed on a schedule for monitoring the bacteriological quality of their water. The WQB plans to have all supplies analyzed for nitrates next year and hopes to have most of them on a regular coliform sampling schedule.

Major objectives for the coming year will be:

- Improve compliance of community water supplies for all of the requirements of the Safe Drinking Water Act.

- Provide enforcement through the DHES Legal Division when community public water supplies are not in compliance with the regulations.

- Monitor and enforce the public notification requirements of the Safe Drinking Water Act.

- Improve the bacteriological quality of those supplies not meeting the MCL for coliform bacteria.

- Grant variances and establish compliance schedules for those systems which need physical improvements to meet MCL's.

- Update regulations as needed.

- Conduct field investigations at approximately 90% of all public water supplies.

- Provide technical assistance regarding the operation and maintenance of public water systems.

- Provide training and certification for operators.

- Review plans and specifications for new supplies and improvements to existing systems.

- Develop DHES policies to improve plan review and rewrite regulations as needed.

- Provide certification for chemical and bacteriological laboratories.

- Emphasize improving the compliance of noncommunity public water supplies.

Underground Water

Since the State of Montana has not given an indication of assuming primacy over the Underground Injection Control Program (UIC) during FY 81, EPA will be handling all aspects of this program. The contract with the Montana College of Mineral Science and Technology, Bureau of Mines will be completed at the end of FY 81. This contract will provide maps, cross-sections and narratives detailing aquifer characteristics throughout the state. In addition, it will provide an inventory of the various categories of injection wells being used in the state.

At the writing of this narrative, the UIC technical regulations still have not been promulgated. The implementation of the regulation will begin within 270 days after final promulgation.

A petition to designate the Helena Valley as a sole source aquifer was received by EPA during FY 80. After holding a public hearing in Helena to gather more information on the subject, a decision must be made by the Region VIII Administrator as to whether or not to designate the aquifer as a sole source. If it is so designated, all federally assisted projects must be reviewed by EPA to determine that they will not adversely impact the groundwater of the area.

Instream Flow Activities

Dewatering - the excessive and unnatural reduction of instream flows usually caused by seasonally heavy irrigation diversions - is one of Montana's "Big Three" water quality problems, along with sediment and salinity. More than 800 miles of streams are known to be seriously dewatered, according to a survey completed by the Montana Association of Conservation Districts. Yet, for a variety of reasons, the state has not developed a systematic procedure for addressing and mitigating the water quality effects of dewatering. To initiate such a systematic procedure, is the objective of this proposal.

The DHES dewatering program will be keyed on a provision of the 1973 State of Montana Water Use Act, which allows state agencies to apply to the Board of Natural Resources and Conservation for reservations of instream flows. Such reservations are subject to the rights of prior appropriators and to the availability of unappropriated water. The DHES already has successfully exercised this option in the case of its Yellowstone River flow reservation. However, preparing and defending an application for a flow reservation is a costly process. Hence, the DHES must choose its streams carefully and objectively, to insure the optimum return on its investment. On the other hand, DHES must proceed with deliberate speed to get a place in line that will assure the department of not getting shut out of the water allocation process altogether. The WQB has identified instream flows as one of its top four priorities during state fiscal year 1981 (July 1, 1980 to June 30, 1981). The bureau intends to fill one of its existing vacancies in the Water Quality Management Section with a surface water hydrologist, who will be assigned half-time to instream flow activities. Existing bureau personnel - including two field specialists, two water quality specialists, and a computer programmer - will have their position responsibilities redefined so the total bureau instream flow effort for fiscal year 1981 will be 1.94 work years. (See detailed statewide 208 work plan for state FY 1981.) However, additional assistance will be needed, at least initially, to rank our priority flow reservation streams and to determine water availability in those streams.

The bureau envisions a three-part program on instream flows, encompassing A) applications for reservations, B) public information and education and C) coordination with other agencies.

Construction Grants

Full delegation of construction grants activities with the exception of constructability/biddability reviews will be a priority item during FY 1981. The WQB will be fully staffed by midyear resulting in considerable improvement in grant processing and quality of projects.

The assumption of the function delegated to the Corps of Engineers (COE) (i.e., biddability/constructability reviews) will be dependent upon continued quality reviews by COE personnel. Should the WQB feel confident in its own resources to perform this function, as compared to the COE, an effort will be made to assume this responsibility prior to FY 1982.

The 205(g) delegation agreement for FY 1980 is being developed between the WQB and the EPA's Montana Office. This document will outline in detail the tasks and responsibilities necessary for total delegation of construction grant activities.

Solid Waste

Hazardous Wastes

During the upcoming fiscal year, a major priority will be the continuing development of a statewide hazardous waste management program. Modifications in the administrative rule to the "Montana Solid Waste Management Act" will be completed. These modifications will place Montana in a position to assume responsibility for a state hazardous waste management program. In addition, procedures for maintaining such a program will be finalized. These procedures will include the adoption of a common manifest system, institution of a permit priorities mechanism and the establishment of a surveillance/enforcement program.

In FY 1981, an application for interim authorization for Phase I will be finalized and submitted to EPA for approval. This application will include a comprehensive authorization plan. The plan will be structured in accordance with federal requirements and will reflect the hazardous waste section of the "Montana State Plan for Solid Waste and Hazardous Waste Management." These documents will demonstrate the integration and coordination of Montana's hazardous waste program with the Clean Water Act and the Safe Drinking Water Act.

The State of Montana currently maintains an emergency response system which includes a response plan and an active emergency response team. This team is comprised of a cross section of state agencies representing a broad spectrum of disciplines. Such structure assures that state government can provide technical advice and direct assistance to a variety of emergency situations. During the next year, procedures will be developed to assure that the emergency response system can adequately provide for followup of remedial measures in crisis situations.

As the state's hazardous waste program is developed, measures will be taken to assure that adequate work force resources are available. As needed, efforts will be made to secure adequate staffing for the hazardous waste program. In addition, the ongoing training of current staff will be maintained. Such educational efforts will take advantage of training programs that are offered by the federal government and institutes of higher learning.

In all of the above-mentioned activities, a concerted effort will be made to provide public participation. Current state law and regulation already provide for a formal mechanism for public review and comment in the issuance of all permits. In addition, state law requires the DHES follow formal procedures to insure adequate review of any action that will directly impact citizens of the state. The level of public participation undertaken in other activities will depend on the degree of interest from affected or interested persons. Public participation will rely heavily on the mass media, direct mailings, public meetings and public hearings.

As in the past, the SWMB will continue to provide technical assistance and information to all interested or affected persons. The extent of this service may be found in the program accomplishments section of this document.

Finally, the abandoned disposal site identification program will continue to be maintained.

Open Dump Inventory

Current Montana law provides mechanisms which are being used extensively in conducting portions of the formal open dump inventory. The 1977 "Montana Solid Waste Management Act" requires the bureau to license all solid waste disposal sites with some exceptions (i.e. industrial onsite disposal of nonhazardous wastes). This licensing procedure requires permitting by site classification. As of October 1, 1980, 147 disposal sites will have been issued licenses (93 permanent 54 conditional). The licensing process is especially useful in gathering baseline data for the open dump inventory. In addition, the 1977 "Solid Waste Management Act" allows the SWMB to issue state grants to local government entities for purposes of conducting detailed solid waste management planning. A condition of each planning grant is that a careful assessment be made of existing disposal sites within the planning area. As with the state licensing procedure, the planning effort is of considerable assistance in conducting the open dump inventory.

In fiscal year 1981, major activities associated with the open dump inventory will include the establishment of classification priorities and the gathering of necessary information for the classification process. These activities will be conducted in conjunction with the continued identification of disposal sites statewide.

A major activity of the bureau will be to initiate follow-up enforcement action on those facilities that are identified as open dumps and for which no effort has been taken to close or upgrade.

The identification of municipal solid waste and sludge disposal sites will utilize methods such as those previously mentioned. With respect to industrial nonhazardous disposal sites, the identification process will rely extensively on surveys and questionnaires that will be sent to all major industries in the state. Because state law allows individuals to dispose of nonhazardous waste on their own property, the physical inspection of individal industrial sites will occur only with the specific permission of the property owner.

State Plan Revision

To reiterate, it is anticipated that a revised state plan will be finalized before October 1. However, if complications arise in the development of that document, it will be completed during the first part of fiscal year 1981.

Facility Planning And Implementation

It has not been determined, to the satisfaction of the DHES, that there is a true need for a centralized hazardous waste disposal facility in Montana. During FY 1981, an evaluation will be made to ascertain the quantity and composition of hazardous wastes in Montana and their geographical distribution. If a true need exists, regional collection centers will be established where generators may dispose of wastes. Periodically, the material will be transported to approved hazardous waste disposal facilities out-of-state. Continual evaluation will be made of the volume and type of hazardous wastes deposited at the collection centers, and the continued availability of approved disposal facilities out-of-state. If, as a result of this evaluation, a need can be demonstrated, action will be initiated to develop a centralized hazardous waste disposal facility(s) within Montana.

Finally, the SWMB will conduct preliminary geological and water (surface and groundwater) evaluation of the state for the purposes of siting solid and hazardous waste management facilities.

Pesticides

Enforcement

The DOA's authority for registering pesticides, licensing and certifying applicators, licensing dealers and operators, and for conducting inspections and carrying out enforcement actions is provided for in the Montana Pesticides Act, Section 80-8-101 through 306 MCA 1979.

The DOA proposes to continue the comprehensive cooperative enforcement program and agreement with EPA through inspections (including use/misuse, restricted, and general use products, records and proper licensing), investigations, pesticide sampling, laboratory pesticide analysis, efficacy studies and enforcement actions. These activities would be continued under the quality assurance agreements made with EPA under previous grants. The DOA's pesticide specialists hold EPA credentials and have the authority to carry out the mandates of the Federal Insecticide, Fungicide and Rodenticide Act as well as the Montana Pesticides Act.

The DOA has been granted "primacy" under the policies and procedures established by EPA. It is the intent of the department to serve as the primary agency in conducting inspections, investigations and sample collection and analysis in accordance with EPA approved procedures and to take effective action against violators. The state has recommended some changes that will improve the monitoring of Section 24(c)'s, Section 18's, and experimental use permits.

The promulgation of regulations restricting the use of aquatic herbicides in Montana will require a major commitment from the DOA in FY 1981 for training, inspecting and monitoring the sale and application of aquatic herbicides.

The approval of a Section 18 exemption by EPA to use 1080 to control damage caused by Columbian ground squirrels in 19 western Montana counties will also require a substantial commitment in terms of inspections, record keeping and use observations during FY 1981.

Continuing efforts will be made to determine if pesticide drift is, or may be, a contribuitng factor in causing environmental damage. Recognizing that different pesticides products, varying carrier rates and climatic conditions will affect drift, it is improbable that an overall drift policy can be developed by the end of FY 1981.

The DOA's pesticide analytical laboratory will continue to maintain (and improve) the quality assurance program for sample handling and analysis. The laboratory will continue to provide pesticide analytical services to EPA and other states on a fee basis which will cover the cost of supplies, materials and communications.

The cooperative enforcement agreement between the DOA and EPA will be revised and updated during FY 1981.

Since the DOA's enforcement program is subject to yearly review and funding by EPA, no long range objectives can be projected. All objectives stated are for the 1981 federal fiscal year.

The allocation of personnel to the Environmental Management Division of the DOA is 29.6 full time equivalent (F.T.E.) for FY 1981. State funding supports 13.01 F.T.E. and EPA funding will support 16.50 F.T.E.'s under the pesticide enforcement grant. The F.T.E. in support of enforcement grant activities will be 21.55 of which 16.50 F.T.E. are federally funded and 5.05 F.T.E. are state funded.

The allocation of monies is as follows: $412,607 represents the grant monies from EPA; $107,541 is the state's matching funds; and $37,393 represents the amount allocated for indirect costs. The total combined budget for FY 1981 will be $557,541.

The specific activities and accomplishment commitments can be found in the Pesticides Media Work Plan.

Certification

The certification program is a federally mandated program which requires pesticide applicators using restricted-use pesticides to comply with state and federal certification standards. The Montana Certification Plan was approved by EPA and has been in effect since 1976.

The strategy will be to maintain the data processing system for the storage of qualification data for dealers and applicators and for the issuance of certification credentials to qualified applicators as well as to newly certified individuals entering the system.

Most of the commercial and government applicators requiring certification have been certified, but the strategy will be to conduct at least one general certification course (24 hours) for new applicators who wish to be certified. Indications are that approximately 80% of the private applicators desiring certification have been certified. The strategy will be to conduct training for private applicators in those counties where the need is expressed.

The strategy for recertification will be to provide recertification training for the following applicator categories: Agricultural Animal, Agricultural Plant, Public Health, Regulatory Mosquito and Regulatory Quarantine. Additionally, the private applicators in Agricultural District III will receive recertification training specific to their needs (crops, cropping systems and pest complex present).

Under the proposed grant activities, no specific personnel will be funded, but grant activities will amount to 1.02 F.T.E.'s. The state share in achieving the certification objectives will be a 50 percent match of federal funds ($20,000).

Radiation

Butte Radiation Program

The purpose of the Butte Radiation Study is to: determine the contributing factors to the elevated radiation levels in Butte, ascertain the geographical area(s) of the city most severely impacted, determine the levels of radiation to which Butte residents are exposed, define the health risks associated with these elevated radiation exposures and insofar as possible, determine methods to reduce radon and radon progeny levels in the affected dwellings in Butte.

Under contract with EPA, the Occupational Health Bureau (OHB), DHES, has established an ambient radon and radon progeny monitoring station at Hebgen Park. Data accumulated at this station will be evaluated to determine diurnal and seasonal fluctuations in radon and radon progeny concentrations. In addition, data accumulated at this station will provide information pertaining to the equilibrium in ambient air between radon progeny and the parent radon-222.

As a cooperative effort, the EPA's Las Vegas Laboratory and OHB will conduct preliminary evaluations of radon and radon progeny levels and sources in the city of Butte. These evaluations will be accomplished primarily through the review of existing data.

The OHB will place 150-200 track etch dosimeters in the Butte soil on a grid basis to determine radon soil-gas concentrations. The grid system to be utilized will be developed as a cooperative effort between OHB and EPA. The placement of these dosimeters will assist in identifying radiation problem areas in the city of Butte.

OHB will measure radon progeny concentrations in approximately 100 structures utilizing Radon Indoor Progeny Integrating Sampling Units (RIPISU's) to be provided by the EPA. Each structure will be measured for a period of one week, four times a year at three month intervals. Information gained by these measurements will provide a reasonable estimate of average annual radon progeny concentrations in structures sampled.

OHB will perform radon exhalation tests on construction materials such as concrete, brick, sheetrock, etc., to determine the contribution that various construction materials are making to the elevated radon concentrations found in homes.

OHB will determine radon and radon daughter concentrations in homes using the grab sample method. This method of sampling will provide a rapid method of determining the geographical area of Butte most severely impacted by radiation exposure and will provide additional information concerning the equilibrium between radon and radon progeny in structures.

Environmental samples will be collected by the OHB for radioanalysis to be performed by the EPA Laboratory in Las Vegas. Samples will be collected as requested by the EPA Project Officer.

An additional contract is being negotiated between EPA and DHES under which EPA would supply track etch dosimeters and perform statistical analyses of data and OHB would place and collect the dosimeters from approximately 1000 Butte homes. This proposed contract will also make provision for remedial action research to be performed by OHB to determine methods that can be used to reduce radon and radon progeny concentrations in structures.

MEDIA WORK PLANS

Air

Water

Solid Waste

Pesticides

Radiation

Categorical Programs

Air Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
State Implementation Plan (STATE)			12.14	2.0	368,693	AQB
1. Point Source Compliance - Inspect each Class A-1 source and one-half of Class A-2 sources at least once per year (EPA inspect 12 sources).	40	100				AQB
2. Area Source Compliance - Inspect significant area sources at least once per year.		As required				AQB
3. Enforcement - Take enforcement actions against significant A-1 and A-2 violators. Initiate enforcement action within 30 days of violation.		Necessary action				AQB
4. Emission Inventory Update-Update the emission inventory for Class A-1 and A-2 sources. Provide quarterly updates through EIS on compliance status.	40	100				AQB
5. Missoula and Billings TCP - Track implementation	As required					AQB
6. Butte TSP - Adopt and submit airborne particulate rule to EPA (DESPUR)	2/15/81					AQB
7. Intergovernmental Cooperation - Review and update the Section 174 agreements for transportation - related pollutants.	one program					AQB
State Implementation Plan (EPA)				0.35		
1. Identify A-1 and A-2 source classifications.		One report				EPA
2. Missoula CO						
a. Reevaluate CO problem for impact of stoves and fireplaces - conduct study	Oct.-Mar. 81				20,000*	EPA
b. Prepare report		June 81				

*FY 1980 Funds

Air Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
3. Lead SIP			0.4	0.2	16,411*	AQB,EPA
a. Carry out ambient monitoring program in vicinity of ASARCO smelter	Begin study Oct. 1980	1 report			50,000*	AQB, EPA
b. Evaluate fugitive emissions at ASARCO smelter	Begin study April, 1981	1 report			25,000	EPA, AQB
c. Model emissions and evaluate control strategies		Nov., 1981			5,000	AQB, EPA
d. Complete SIP revision report		Dec., 1981				AQB
e. Hold public hearing		Jan., 1982				AQB
f. Submit SIP to EPA		Feb., 1982				AQB
g. Anaconda - Prepare, adopt and submit SIP revision	Feb., 1981					AQB
Great Falls CO						
1. Complete final designation of nonattainment area	Sept. 1980					EPA
2. Designate lead agency	Sept. 1980					State
3. Complete emissions inventory	Dec. 1980					GF
4. Complete additional monitoring if needed	Feb. 1981					GF
5. Model results and evaluate control strategies	March 1981					GF
6. Prepare, plan and hold a public meeting		May 1981				GF
7. Submit plan to EPA		June 1981				AQB
New Source Review			4.0	1.2	124,112	
1. Permits - Issue approximately 80 new source permits	40	80				AQB
2. New PSD Review - Review and issue approximately 15 PSD permits	10	15				AQB
3. Baseline Monitoring and Data - Review industry baseline monitoring systems and subsequent data for approximately 10 PSD areas	5	10				AQB

*FY 1980

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
4. Increment Modeling and Tracking - Review industry baseline monitoring systems and subsequent data for approximately 10 PSD areas	5	10				AQB
5. Visibility Requirements - Propose a visibility SIP revision for Class I areas.	0	1 plan June, 1981				AQB
Monitoring			10.6	0.25	308,897	
1. Complete annual network review	Jan.1981					AQB
2. Complete annual review of Quality Assurance Plan and Standard Operating Procedures	6/1/81					AQB
3. Begin operation of NAMS	1/1/81					AQB
4. Begin quarterly reporting of NAMS data and agency precision and accuracy data	7/1/81					AQB
5. Complete installation and beginning operation of 40% of SLAMS monitors.		9/30/81				AQB
6. Complete site, system, and performance audits of selected PSD monitoring programs	As Required	ongoing				AQB/EPA
7. Perform system audits of State Air Monitoring Program		9/30/81				EPA
8. Emission Monitoring Program - Audit continuous emission monitoring requirements on the four designated sources		4 audits				AQB
9. Company Data Retrieval/Storage - Implement the program to retrieve and store company-collected data		1 plan				AQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
10. Execute and implement written agreement with Anaconda Company to require that company-operated ambient monitoring stations comply with EPA monitoring criteria for SLAMS stations, and with EPA requirements for quality assurance as set forth in 40 CFR Part 58	Oct. 1980					
11. Implement SO_2 monitoring network in Billings per stipulation in Laurel SO_2 SIP	Oct. 1980					AQB
			0.2		6,206	AQB
Training						
Other						
1. Develop performance and emissions standards for the following industries:			5.0		155,140 (49,417)*	AQB
a. Coal mines	July, 1981					
b. Oil refineries	July, 1981					
c. Sulfur plants	July, 1981					
d. Elemental phosphorous plants	Dec., 1981					
Analyze and model emissions from wood stoves		July, 1981				AQB
Develop PSD increment tracking		May, 1981				AQB
2. Develop regulations** for the following: Offset policy (173(1)), compliance of all owned sources (173(3)), carrying out of implementation plan (173(4)). Amend existing rules regarding future effective dates of permits and transfer of permits. Schedule as follows:						

*FY 80 Funds

**Contingent upon favorable atmosphere per John Bartlett's letter of May 15, 1980.

Air Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
a. Rough draft of rules to EPA		May, 1981				
b. Proposed rules available		June, 1981				
c. Board hearing on rules		July, 1981				
d. Rules submitted to EPA as SIP revision		Oct. 1981				
		Federal Grant		4.00	550,000	
Other State Resources or Supplemental EPA		State Resources	32.34		394,714	
		Grant Request			64,745	
		Total			1,009,459	

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Wastewater Discharge Permit Program						
1. Issue, reissue or modify major permits insuring that Water Quality Standards are met, toxic criteria limitations and pretreatment requirements are imposed, residual wastes are handled adequately and appropriate effluent limitations and self-monitoring are provided.	8	10	1.4	0.3		State EPA
2. Issue, reissue or modify minor permits as needed.	45	90	1.7	0.1		State EPA
3. Provide compliance inspection and sample monitoring.						
a. Compliance monitoring, inspections of all major discharges using EPA form 3560-3.						
b. Sampling inspections of all 15 major industrial permittees at least twice; 10 major municipal dischargers will be sampled at least once; minor dischargers will be sampled as needed.	25	50	0.7 WQB 0.7 Lab *	0.1	17,939	State State EPA
4. Provide appropriate enforcement action.						
a. Violations which are continuing and causing damage to an existing beneficial use will be given prompt attention.						
b. Violations by major dischargers with discharges of toxic materials will be given high priority.			0.9 WQB 0.5 Legal		8,333	State State
c. Other violators will be handled as time allows.	As Needed	As Needed		0.55		EPA
d. State will be informed of EPA enforcement activities.						EPA
5. Provide review and appropriate notification on self-monitoring information as reports are received. EPA-Helena reviews federal facilities self-monitoring.	Continuous	Continuous	0.5	0.1		State EPA
6. EPA 309(a) notice of violations (NOVs)	As Appropriate	As Appropriate		0.1		EPA
a. EPA summary of outstanding 309(a) NOVs.	6	12		0.1		EPA
b. State response on outstanding 309(a) NOVs.	6	12	0.1			State

*These figures are not included in the WQB staff resource summary.

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
7. Quarterly Non-Compliance Reports			0.2			
8. Reconnaissance inspections. Estimated number = 75.	30	75	0.5			State EPA
9. Assume federal facility delegation (except Indian Reservations).		Sept. 30, 1981	0.02	0.05		State EPA
10. Assume delegation of pretreatment programs.		April 1, 1982	0.1	0.05		State EPA
11. Investigate complaints of illegal discharges and possible violations of water quality standards and provide follow-up.	Continuous	Continuous	0.7	0.1		State EPA
12. Provide coordination between permits/enforcement program and construction grant program (includes quarterly noncompliance report).	Continuous	Continuous	0.1	0.05		State EPA
13. Review MPDES programs for possible inclusion in the EPA's consolidated permit program.	As Required	As Required		0.1		EPA
14. Develop and implement the Municipal Management System (MMS).			0.05	0.22		
15. State program overview, policies, procedures and output reviews.	April 1, 1981	Oct. 1, 1981		0.5		
		Subtotals	6.69		200,037	WQB
			.7		17,939	Lab
			.5		8,333	Legal
		Total	8.17	2.42	226,309	

Water Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE THROUGH MIDYEAR	MILESTONE THROUGH END OF YEAR	RESOURCES WORKYEARS STATE LOCAL	RESOURCES WORKYEARS EPA	RESOURCES DOLLARS	RESPONSIBLE AGENCY
Groundwater/Dredge & Fill						
Groundwater (excludes UIC)			0.5 WQB			
1. Develop groundwater regulations.		Dec. 31, 1981	0.1 Legal		1,667	State
2. Investigate complaints of groundwater pollution and provide recommendations. Provide enforcement when needed.			0.2 WQB			State
3. Monitor groundwater problems and obtain groundwater samples for analyses.			0.2 WQB 0.1 Lab		2,562	State
		Subtotals	.9		25,830	WQB
			.1		2,562	Lab
			.1		1,667	Legal
Dredge and Fill		Total	1.10		30,059	
1. Issue 6(g) authorizations for short-term activities which exceed turbidity standards. a. 6(g) authorizations issued	35	70	0.3			
2. Review and issue certifications to section 404 permits.				0.2		EPA Denver (reviews only)
a. Certifications issued	15	30	0.2			State
b. Waive certifications where adequate review provided by other agencies	25	50				
3. Coordinate program with Corps of Engineers, EPA, Dept. of Fish, Wildlife and Parks and Conservation Districts.			0.1			State
4. Inspect operations.						
a. Preconstruction investigations	5	10	0.1			State
b. During construction investigations	5	10	0.1			State
		Total	0.8	0.20	22,960	

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Water Quality Management: Agriculture NPS Pollution Program						
1. Coordination and Implementation of Conservation District Water Quality Management Plans.		5 District Programs	0.8 N.A.	0.2	27,167 143,285	WQB Local Consv. Districts
2. Continuation of DNRC Acriculture Program Development Assistance to Districts.		59 Districts provided assistance	1.35		53,760 3,396	DNRC WQB
3. Implementation of Lewis and Clark County Regulatory Sediment Control Ordinance.		1 Project States Report	1.1		22,000 3,396	LCCCD WQB
4. Ag-Education Assistance to General Public, Conservation Districts and Other Ag Entities.		6 Newsletters, ed. materials, 6 tours	0.5	0.1	16,979	WQB
5. Assessment of Farmland Drainage and Evaluation of Institutional Control Measures.		Technical report program evaluation June 30, 1981	0.2		6,792	WQB
6. Participation on State and Local RCWP Coordinating Committees Update of Agriculture Portion of 208 Plan.		Feb. 1, 1981	0.17	0.1	5,773	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
7. Continuation or Completion of Carry-over Tasks: Musselshell River Streambank Project, Prickly Pear Water Quality Improvement Project, Muddy Creek Special Water Quality Monitoring Project, Biological Monitoring.		April 1, 1981 Musselshell Report June 30, 1981 Prickly Pear Report January, 1981 WQB Muddy Creek WQ Report	1.46	0.1	56,370	WQB
8. Bluewater Creek - Hiring of Coordinator for Renewable Resources Development Project.		Report completed September, 1981			50,000	Carbon County CD
9. Carry-over Contracts: Ag-Video Tape Program, Saline Seep Drain Impact Study, Muddy Creek Coordinator.			0.09		3,056	WQB
10. Renewal of Muddy Creek Project Contract.			1.0		36,330	Cascade County CD
		Total WQB	6.67	0.5	428,304	
Water Quality Management: Forestry NPS Pollution Control Program						
1. DNRC Forestry Division Implements a Demonstration Forestry NPS Management Program in Missoula and Mineral Counties.		September, 1981	1.84		34,000	DNRC Forestry Division
2. WQB Coordinates Programs and Provides Technical Assistance to DNRC Forestry Division. Conducts Channel Stability Surveys in Missoula/Mineral County Priority Watersheds. Assists with Forestry Education Programs and Updates Forestry Portion of 208 Plan.			1.6	0.1	22,228	WQB

ACTIVITY/OUTPUT	MILESTONE THROUGH MIDYEAR	MILESTONE THROUGH END OF YEAR	RESOURCES WORKYEARS STATE LOCAL	RESOURCES WORKYEARS EPA	RESOURCES DOLLARS	RESPONSIBLE AGENCY
3. Implementation of USFS Management Agreement with USFS.			0.2	0.05	2,917	WQB
		WQB	1.8	0.15	25,145	
		Contract	1.8		34,000	
		Total	3.6		59,145	
Water Quality Management: Mining NPS Control Program						
1. Develop and Implement Mining NPS Control Program in Cooperation with DSL. Contract Completion Implementation Initiated.		Dec. 31, 1980	0.7	0.1	25,145	WQB
		June 30, 1981	N.A.		20,000	DSL
2. Participate in Western Coal Planning Assistance Program and Coal Planning Teams.				0.1		
		WQB	0.7	0.20	25,145	
		Contract			20,000	
		Total			45,145	
Water Quality Management: Instream Flow Program						
1. Develop WQB Instream Flow Program, Policies and Strategy.		Feb. 1, 1981	0.4	0.1	13,284	WQB
2. Determine Priority Streams for Instream Flow Reservations.		Feb. 1, 1981			15,000	Consultant
			0.8		18,333	DNRC
			0.4		13,284	WQB
3. Develop Instream Flow Methodologies and Determine Instream Flow Needs for Maintaining Water Quality in Top Priority Streams.		Sept. 30, 1981	0.8	0.1	26,568	WQB
4. Begin Preparation and Defense of Applications for Instream Flow Reservations.		Sept. 30, 1981	0.1		3,322	WQB

ACTIVITY/OUTPUT	MILESTONE THROUGH MIDYEAR	MILESTONE THROUGH END OF YEAR	RESOURCES WORKYEARS STATE LOCAL	RESOURCES WORKYEARS EPA	RESOURCES DOLLARS	RESPONSIBLE AGENCY
5. Develop Instream Flow Public Participation and Information Program.		Sept. 30, 1981	0.2		6,642	WQB
6. Coordinate WQB Instream Flow Program with those of DNRC, DFW&P, USFS and BIM.		Sept. 30, 1981	0.1	0.1	3,322	WQB
7. Continue DFW&P long-term Fish/Flow/Temperature Study on Upper Missouri River and Tributaries.		Sept. 30, 1981			26,675	DFW&P
			0.1		2,000	WQB
		WQB	2.1	0.3	68,424	
		Contract	0.8		60,006	
		Total	2.9		128,430	
Water Quality Management Plans						
1. Implementation of certified and approved areawide Water Quality Management plans.	Refer to detailed work plans for milestones.					
a. Flathead Drainage 208 Plan			2.0	0.1	68,000	FH 208
b. Blue Ribbons 208 Plan			0.4	0.1	26,000	BR 208
c. Yellowstone - Tongue 208 Plan			0.5	0.1	24,000	YT 208
		Total	2.90	0.3	118,000	
Clean Lakes						
1. Lake Inventory Inventory trophic status of at least 300 of Montana's most significant lakes and prepare a priority list for lake restoration activities			0.1	0.1	100,000	FWP WQB MSU MU EPA
2. Lake Restoration			0.15	0.2		
a. Sacajawea Lagoon (Livingston) Restoration activities include dredging and construction of sediment control facilities					464,000	

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
b. Georgetown Lake (Anaconda) Diagnostic and feasibility study					142,000	
3. Development of New Projects				0.05		
a. Phase I - FY 81-82						
Seeley Lake - excessive macrophytes					100,000	
Foys Lake, Kalispell - dewatering, low water levels					100,000	
Lake Mary Ronan - low turnover, home disposal, livestock					40,000	
Echo Lake, Big Fork - subdivisions, home disposal					100,000	
b. Phase II - FY 1982						
Foys Lake - flow augmentations					250,000	
Georgetown Lake - selective dredging and macrophyte abatement					500,000	
		Total	0.25	0.35	1,796,000	
Water Quality Management						
1. Initiate Third Round Revisions to Montana Water Quality Standards.			0.1	0.05		WQB
Identify toxic pollutant problem areas and develop toxic priorities for Water Quality Standards Revision.						WQB
Incorporate toxic pollutants for inclusion in State Water Quality Standards (within two years of EPA publishing final regulations).						WQB
2. Adopt Non-degradation Rule.						
a. Development Workshops	October		0.15	0.1		WQB
b. Submit to Board	December		0.05			WQB

Water Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
3. Fixed-Station Monitoring			0.5			WQB USGS FWP
For federal fiscal year 1981, the following seven USGS NASQAN stations have been designated as the state's Ambient Monitoring Network: Missouri River at Toston Milk River at Nashua Yellowstone River near Livingston Yellowstone River at Billings Tongue River at Miles City Clark Fork River below Missoula Flathead River at Columbia Falls		Continuing				
4. Biological Monitoring and Intensive Surveys.			1.28	0.1		WQB
5. Develop a State Waste Load Allocation Process Per PRM 79-11.						WQB
Develop effluent limitations.		June 12, 1981				WQB
6. Revise Continuing Planning Process in Accordance with EPA Guidance.		March 1, 1981	0.01			WQB
7. Complete FY 1982 208 Workplan.		Aug. 1, 1981	0.1			WQB
Negotiate geographic priorities under guidance from the Regional EPA Office.		May 1, 1981				WQB
8. Approval of FY 1982 208 Workplan.		Aug. 15, 1981				EPA
		Total	2.19	0.25	62,852	

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Water and Wastewater Operator Certification						
1. Issue Certification Licenses to Operators and Give Examinations to New Operators.			0.5		14,982	WQB/ Water & Wastewater Certification Board
a. Licenses Issued		600				
b. Exams Given		150				
		Total	0.5		14,982	
Operation and Maintenance						
1. Inspections						
a. EPA Form 7500-5			0.2			
b. State Form			0.5			
c. Special Assistance			0.2	0.2		
2. Operator Training						
a. Annual School		1	0.05			
b. Special Seminars			0.05			
c. Laboratory School		1	0.05	0.01		
3. Big Sky Clearwater						
4. 104 (g) (1): Implementing JTCC			0.1	0.03		
5. 109 (b): Training Facility			0.1	0.01		
a. Needs Assessment	1					
b. Application Submitted		1				

Water Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
6. Plan and Spec Review (Not construction grant or water supply).						
a. Review sanitary sewer extensions	15	35	0.4			
b. Review proposed storm sewer discharges	5	12	0.1			
c. Review waste water treatment facilities	8	20	0.3			
		Total	2.05	0.25	58,834	
Drinking Water						
Administration						
1. Provide general program direction and supervision and development of staffing and budget needs.	Sept. 30, 1981		0.8	0.5	22,438	WQB
2. Regulation Revision						
a. Revise drinking water regulations as necessary	Sept. 30, 1981		0.05		1,402	WQB
b. Revise regulations on plan review	Sept. 30, 1981					
3. Prepare and submit the annual report in the format and containing the information required by EPA by January 1 for the previous fiscal year. The annual report will also include an update of the inventory of public water supplies.	Jan. 1, 1981		0.1		2,804	WQB
4. Participate in the annnual program management review including assisting in the data gathering effort and in the discussion of the report.	March 31, 1981		0.05		1,402	WQB
5. Administer contracts with local health departments for inspections of public water systems.		24	0.1		2,804	WQB
		Total	1.10	0.5	30,850	

Water Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Surveillance and Technical Assistance						
1. Perform inspections of public water systems with written survey reports to the owners or operators.			2.3		64,510	WQB
a. Contracted county sanitarians		1,000			35,000	WQB
b. Contracted individual(s)	As needed	200			7,000	WQB
c. Water Quality Bureau Staff		400				
2. Provide technical assistance to owners or operators of public water systems regarding the plannings, operation, maintenance, and treatment of water systems.		136	0.5		14,024	WQB
		Total	2.8		120,534	
Plan Review						
1. Review plans for new supplies and system improvements.		300	2.2		61,706	WQB
2. Perform inspections during construction and after construction is completed.		10	0.1		2,804	WQB
		Total	2.3		64,510	
Laboratory Certification						
1. Provide certification by performing evaluations of laboratories which propose to do analyses which will be submitted for compliance with State regulations. Labs certified include:			1.7	0.1	30,000	State Lab Div.
a. Bacteriological laboratories		14				
b. Chemical laboratories		10				

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Laboratory Capability						
1. Provide laboratory facilities with the capability to do analyses as required by the State regulations. The type of sample which the State Laboratory will analyze are:			4.6		58,294	State Lab Div.
a. Bacteriological samples		5,000				
b. Inorganic chemical samples		225				
c. Organic chemical samples		15				
d. Nitrate only samples		600				
Training and Certification						
1. Provide training for water system operators.		350	0.8		22,438	WQB
2. Provide certification for water supply and distribution operators.		50	0.1		2,804	WQB
3. Provide training to employees of local health departments in order to allow them to meet the obligations of their contracts.		36	0.2		5,609	WQB
4. Provide training or ensure that training is provided to members of the drinking water staff on administrative and/or technical requirements of their jobs.		10	0.2		5,609	WQB
		Total	1.30		36,460	
Enforcement						
1. Review bacteriological monitoring results daily.		Sept. 30, 1981	0.3		8,414	WQB
a. Notify systems with unsafe results to do check sampling as per the regulations and follow up on the notification to ensure that check sampling is done.						

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
b. Notify systems that fail to monitor or that exceed the maximum contaminant level for a reporting period to give public notification. Follow up on that notice to ensure that the water system does give public notification. c. Provide public notification for those systems that fail to give notice themselves. d. Require correction of whatever is causing the continual bacteriological problem, including the use of continual disinfection.						
2. Review turbidity results monthly. a. Notify systems that fail to monitor or that exceed the turbidity MCL to give public notification. Follow up on that notice to ensure that the water system does give public notification. b. Provide public notification for those systems that fail to give notice themselves. c. Require correction for those systems continually exceeding the turbidity MCL by first processing the exemption request and by issuing a compliance schedule.		57	0.1		2,804	WQB
3. Prepare a schedule whereby all community surface water supplies and ground water supplies have a sample analyzed for inorganic chemicals as required by regulations. a. Notify systems that exceed the inorganic chemical MCL's to give public notification. Follow up on that notice to ensure that the water system does give public notification. b. Provide public notification for those systems that fail to give notice themselves.		238	0.2		5,609	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
c. Require correction for those systems that exceed the MCL's. The first step in this is the processing of exemption requests and the issuing of a compliance schedule. Priority for correction should be based on the health hazard involved and the population at risk.						
4. Complete the radiological monitoring of all community water systems as per plan.		Oct. 1, 1982	0.2		5,609	WQB
a. Notify systems that exceed the radiological MCL's to give public notification. Follow up on that notice to ensure that the water system does give public notification.						
b. Provide public notification for those systems that fail to give notice themselves.						
5. Complete the nitrate monitoring of all noncommunity water systems.		Sept. 30, 1981	0.1		2,804	WQB
6. Provide judicial enforcement against those public water systems which continually fail to meet the requirements of the drinking water regulations.		Sept. 30, 1981			7,200	WQB
		Total	0.9		32,440	
Data Management						
1. Maintain an inventory of all public water systems.		1,600	0.4	0.1	11,219	WQB
2. Maintain essential records needed for conduct of the public water system supervision program. These include individual records of laboratory results, summaries of bacteriological and turbidity reports and copies of correspondence to and with public water systems including reports of inspections and public notifications.		Sept. 30, 1981	0.7		19,634	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
3. Secretarial Duties		Sept. 30, 1981	1.0		28,048	WQB
		Total	2.10		58,901	
Drinking Water UIC						
1. Characterize aquifers through maps, cross-sections and narratives that detail: a. Altitude on top surface of aquifer b. Thickness of aquifer c. Potentiometric surface of aquifer d. Chemistry of water in the aquifer		Sept., 1981		0.3	74,000	Contract w/Montana Bureau of Mines
2. Provide information on water use by aquifer by area.		Sept., 1981				"
3. Inventory Class I, II and III injection wells using injection well inventory forms.		Sept., 1981				"
4. Draft a plan for inventorying Class V wells that may adversely affect underground drinking water sources.		Sept., 1981				"
5. Within 270 days of promulgation of technical regulations, begin to implement the UIC Program.	April, 1981			0.7		EPA
6. Make determination on whether or not the Helena Valley is a sole source aquifer.	March, 1981			0.1		EPA
		Total		1.1	74,000	

Water Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Construction Grants						
A. Delegation of the Program - 205 (g)						
I. ACTIVITIES						
1. PRE-GRANT AWARD						
a. Priority List Review and Acceptance*			0.15	0.05	4,320	EPA
b. Pre-application Conference	SD		0.25		7,200	WQB
2. STEP 1 GRANT APPLICATION AND AWARD						
a. Plan of Study	SD		0.2	0.05	5,760	WQB
b. Review of Application and Clearinghouse Comments	SD		0.1		2,880	WQB
c. Review of Proposed Engineering Contracts	SD		0.2		5,760	WQB
d. Processing Step 1 Grant Offers**	S/E	S/E	0.05	0.05	1,440	WQB/EPA
e. Minority Business Enterprise (MBE) Review**	SB	SB	0.01	0.05	576	EPA/WQB
3. STEP 1 GRANT ACTIVITIES						
a. Overall Management of Projects****	SD		0.1	0.05	2,880	WQB
b. Mid-Course Facility Planning Meeting	SD		0.1		2,880	WQB/EPA
c. Public Participation Programs	SD		0.2		5,760	WQB
d. Payments**	SB	SA	0.2		5,760	EPA/WQB
e. Grant Amendments**	S/E	S/E	0.05	0.05	1,440	WQB/EPA
4. FACILITY PLAN REVIEW						
a. Review of Facility Plan	SD		0.9		25,920	WQB
b. Infiltration/Inflow (I/I) Analysis	SD		0.15		4,320	WQB
c. Sewer System Evaluation Survey	SD		0.1		2,880	WQB
d. Review of Environmental Assessment and Preparation of Appraisal*	S/E		0.1	0.2	2,880	WQB/EPA
e. Public Hearings*	SD		0.2		5,760	WQB
f. Finding of No Significant Impact*				0.3		EPA

Water Quality

MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
5. ENVIRONMENTAL IMPACT STATEMENT (EIS) PREPARATION AND REVIEW*	S/E		0.05	0.25	1,440	EPA/WQB
6. STEP 2/4 GRANT APPLICATION AND AWARD						
a. Administrative Review of Application	SD		0.25		7,200	WQB
b. Review of proposed Engineering Contracts (including Value Engineering (VE) Proposal)	SD		0.25		7,200	WQB
c. Processing of Step 2/2+3 Grant Offers**	S/E	S/E	0.05	0.05	1,440	WQB/EPA
d. MBE Review**	SB	SB	0.01	0.05		EPA/WQB
7. STEP 2/4 GRANT ACTIVITIES						
a. Overall Management of Project****	SD		0.2	0.05	5,760	WQB
b. Pre-Design Conference	SD		0.1		2,880	WQB
c. In-Process Design	SD		0.1		2,880	WQB
d. Payments**	SB	SA	0.2	0.05	5,760	EPA/WQB
e. Grant Amendments**	S/E	S/E	0.05	0.05	1,440	WQB/EPA
8. PLANS & SPECIFICATIONS REVIEW (AND RELATED TECHNICAL REVIEW)						
a. Technical (Including Operability and Maintainability) and Administrative Review of P & S	SD		0.5		14,400	WQB
b. Constructability and Biddability						COE
c. Draft Plan of Operation Review	SD		0.05		1,440	WQB
d. Review of User Charge (UC)/Industrial Cost Recovery (ICR) System	SB	SA	0.05	0.05	1,440	WQB/EPA
e. Review of Pretreatment Plan	SD		0.05	0.05	1,440	WQB
f. Review of Value Engineering (VE) N.A.						
9. STEP 3 GRANT APPLICATION AND AWARD						
a. Administrative Review of Application	SD		0.25		7,200	WQB
b. Review of Proposed Engineering Contracts	SD		0.25	0.05	7,200	WQB
c. Processing of Step 3 Grant Offers**	SB	S/E	0.05	0.05	1,440	WQB/EPA

Water Quality MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
10. PRE-CONSTRUCTION ACTIVITIES						
a. Overall Management of Project Pre-construction	SD		0.05	0.05	1,440	WQB/EPA
b. Pre-Construction Conference	SD		0.05		1,440	WQB
c. BId Package Review	SD		0.05		1,440	WQB
d. MBE Review**	SB	SB	0.03	0.05	864	EPA/WQB
11. STEP 3 GRANT ACTIVITIES						
a. Overall Management of Projects****	S/E	S/E	0.05		1,440	WQB/COE
b. Processing Change Orders	SD		0.15		4,320	WQB
c. Payments**	SB	SA	0.6		17,280	WQB/COE
d. Grant Amendments**	S/E	S/E	0.05		1,440	
e. Interim Inspections (Including Construction Operability & Maintainability)	S/E	S/E	0.2		5,760	WQB/COE
f. Interim Audit Resolution**				0.05		EPA
12. STEP 3/4 COMPLETION REQUIREMENTS						
a. Plan of Operation Review	SD		0.05		1,440	WQB
b. Operation and Maintenance (O & M) Manual Review	SD		0.25		7,200	WQB
c. Sewer Use Ordinance Review	SB	SA	0.05	0.05	1,440	WQB/EPA
d. UC System Review	SB	SA	0.05	0.05	1,440	WQB/EPA
e. ICR System Review	SB	SA	0.05	0.05	1,440	WQB/EPA
f. Review of Pretreatment Plan	SD		0.05		1,440	WQB
g. Start-Up Services	SD		0.5		14,400	WQB
h. Final Project Inspection (Including Construction Operability and Maintainability)	S/E	S/E	0.15	0.05	4,320	WQB/COE
i. Final Audit Resolution*				0.05		EPA
j. Project Close-Out*						EPA
k. First Year 7500 O & M Inspection and Performance Audit	SD		0.05	0.05	1,440	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
13. INFORMATION CONTROL AND SUPPORT OF REGIONAL CONSTRUCTION GRANTS MANAGEMENT INFORMATION SYSTEM (RCGMIS) INCLUDING GICS	S/E	S/E	0.25	0.1	7,200	WQB/EPA
14. INQUIRY RESPONSE (FOI, CONGRESSIONAL, OMB, GAO, INCLUDING HEADQUARTERS INQUIRIES)**	S/E	S/E	0.1	0.1	2,880	WQB/EPA
15. DISPUTES, APPEALS, PROTESTS*	S/E	S/E	0.05	0.05	1,440	EPA/WQB
16. CONSTRUCTION GRANTS PROGRAM PLANNING (INCLUDING ZERO BASE BUDGET (ZBB))**			0.05			EPA
17. MANAGEMENT DELEGATION	S/E		0.1	0.1	2,880	(WQB)
a. Agreement Management*						EPA
b. Negotiation of Agreement & Amendments*						EPA
c. Special Projects Oversight*						EPA
d. Construction Management Assistance Grant Management*						EPA
18. MANAGEMENT OF CORPS INTERAGENCY AGREEMENT (IAG)						
a. Agreement Management*				0.05		EPA
b. Payment Management*						EPA
19. EPA TRAINING ACTIVITIES						
a. Construction Grants Staff Training and Conference Meetings* -Ongoing-	(S/E)		0.5	0.1	14,400	EPA
(Attendance to Training Sessions) -12-	6	6				
20. CLERICAL ACTIVITIES*** -Ongoing-	SD		2.0	0.5	57,600	WQB
21. DIRECT CONSTRUCTION GRANTS SUPERVISORY MANAGEMENT*** -Ongoing-	SD		0.5	0.1	14,400	WQB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
22. OTHER NON-PROJECT RELATED ACTIVITIES						
a. Advanced Secondary Treatment (AST)/Advanced Waste Treatment (AWT) Review** -N.A.-				0.05		EPA
b. Needs Survey Coordination	SD		0.05		1,440	WQB
c. On-Site Presence During Survey						
d. Combined Sewer Overflow (CSO) Project Review -N.A.-						
		Total	11.05	3.20	331,200	

* These activities cannot be delegated the State or Corps. EPA would retain primary role under any delegation plan, either because delegation is restricted by regulation or the activity is EPA-specific (such as "Management of Delegation"). Even though State or Corps resources related to this activity may be paid for under Section 205 (g), no reduction of the EPA primary workload can occur.

** These activities are technically non-delegable, and the final review responsibility will remain with EPA. However, the State or Corps may, under delegation, assume a strong staff role in support of EPA. In all cases, the EPA monitoring role for these activities will include the overall responsibility for proper execution of these activities.

*** The activities noted (i.e., "CLERICAL ACTIVITIES" (#20) and "DIRECT CONSTRUCTION GRANTS SUPERVISORY MANAGEMENT (#21) are not specifically delegated as separate functions in the formal delegation. Rather, they are gradually assumed as other functions are delegated, and will normally be included in either an overall manpower plan or as part of the workload of these other delegated activities. Therefore, no specific delegation schedule for clerical and supervisory functions is requested.

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
**** The "OVERALL MANAGEMENT OF PROJECTS" (Numbers 3a, 7a, 10a, and 11a) activity refers to the project scheduling and update, day-to-day monitoring of project schedule (including resolution of bottlenecks to completion), and other basic management responsibilities of a project manager not specifically listed elsewhere. The activity will generally not be specifically delegated as a separate function, but will occur at the point when sufficient delegation has taken place to allow EPA to shift out of project specific monitoring for the particular step.						
II. STAFFING						
UPDATE, IF NEEDED, OF THE STAFFING PLAN PRESENTED IN THE 205 (g) DELEGATION AGREEMENT						
B. NEW AWARDS	Obligate approx. $\$1.4 \times 10^6$/month					
COMPLETIONS	- Ongoing -					
Review and Update FY 1981 Priority List		12/31/80				
Review and Update FY 1981 Priority List		03/31/81				
Submit Draft FY 1982 Priority List		05/01/81				
Submit Final FY 1982 Priority List		07/15/81				

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Hazardous Waste						
1. Develop a common manifest system which may be used in lieu of the manifest system created by EPA.			.54	.10	25,500	SWMB, EPA
a. Review and adopt a data processing system						
b. Review notification results which will have been submitted by all persons handling hazardous wastes.	11-19-80					
c. Develop manifest format and publish manifest form.						
2. Develop a permit priorities mechanism.			.28	.30	13,390	SWMB, EPA
a. Review notification results, and part A of permit applications submitted by all hazardous waste facilities which will provide initial data required for setting priorities.		on-going				
b. Request submission and review of part B of permit applications which will require detailed information and specific plans required of all hazardous waste facilities.		on-going				
3. Institute permit priorities mechanism.		09-30-81	.86	.30	40,803	SWMB, EPA
4. Establish a hazardous waste surveillance program to assure compliance with applicable federal and state regulations.		on-going	.92		43,249	SWMB, EPA
a. Annual inspection of all major hazardous waste generators will be conducted.						
b. Annual inspection of all major hazardous waste treatment, storage, and disposal facilities with interim status permits will be conducted.						
c. Inspections of select population of non-major hazardous waste management facilities.						
d. Inspections of select population of hazardous waste transporters.						

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
5. Establish a hazardous waste enforcement program in conjunction with the surveillance program, and which will encompass: a. Facilities with interim status permits. b. Permitted facilities (as applicable). c. Compliance with the manifest system. d. Generators and transporters.			.24	.30	11,480	SWMB, EPA
6. Prepare and submit for EPA approval an application for interim authorization to maintain a state hazardous waste program. This application will initiate the process of the state seeking final authorization to maintain a hazardous waste program.			.82	.40	38,260	SWMB, EPA
a. Prepare all necessary application requirements needed for Phase I approval and submit to EPA for approval by November 19, 1980.	11-19-80					
b. Review regulations for Phase II approval as they become available from EPA.						
c. Prepare and submit to EPA all necessary application requirements needed for Phase II approval by March 1, 1981.	03-01-81					
7. Identify needed statue modifications and introduce appropriate amendments to existing state statutes.		09-30-81	.16	.20	7,680	SWMB, EPA
8. Upgrade and maintain the state emergency response system.		on-going	.18		8,357	SWMB
a. As it becomes available, training in a variety of disciplines will be provided to staff assigned to the emergency response team.						
b. An evaluation of equipment needs will be conducted and necessary material will be purchased.						
c. Provide on-going participation.						
d. Develop procedures to guarantee adequate follow-up of remedial measures in crisis situations.						

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
9. Continue to maintain an abandoned disposal site identification program.		on-going		.30		EPA
a. Provide information dissemination to affected persons.						
b. Preparation of procedures for remedial measures on a case-by-case basis.	1	2				EPA
c. Respond to reports of suspected sites and to crisis situations.	4	6				
Note: The Butte radiation sites are part of the uncontrolled site program. See the Butte Radiation Program Media Work Plan for State and EPA comments.						
Solid Waste Open Dump Inventory						
1. Continue to maintain the open dump inventory classification priorities mechanism utilizing data gathered in preceeding year.		on-going		.10		SWMB, EPA *
2. Continue the identification of municipal solid waste and sludge disposal sites statewide, and submit classification forms to appropriate federal agency.	15 sites	30 sites	.18		7,358	SWMB, WQB
3. Continue the identification of industrial non-hazardous waste disposal sites relying extensively on surveys and questionnaires.			.06		2,453	SWMB
4. Initiate follow-up enforcement action on those facilities that are identified as open dumps and for which no effort has been taken to close or upgrade.		on-going	.40	.05	16,664	SWMB, EPA
5. Request a State Attorney General opinion on whether the state has adequate legal authority to prohibit the establishment of new open dumps and to close or upgrade existing open dumps.	11-01-81		.06		2,453	SWMB

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
State Plan Revision						
As required, complete necessary revision in the State Plan for Solid Waste and Hazardous Waste Management and submit to EPA.	01-01-81		.10	.01	4,158	SWMB, EPA
Solid Waste Facility Planning and Implementation						
1. Conduct an evaluation to determine quantity, composition and geographical distribution hazardous wastes in Montana.		09-30-81	.10		4,102	SWMB
2. If determined appropriate from the evaluation, initiate efforts to establish regional hazardous waste collection centers. This action will include: a. Siting b. Development of procedures for operation and maintenance of centers c. Establishment of contractional agreements for transportation and disposal of hazardous wastes d. Develop a monitoring program to evaluate the operation of the centers.		09-30-81	.05	.05	2,050	SWMB
3. Initiate enforcement action and/or facility planning implementation efforts on disposal facilities that are identified as open dumps and are located on Indian reservations.				.10		EPA
4. Intercede with federal agencies who have administrative responsibilities on public lands where disposal facilities are located which have been identified as open dumps in order to initiate enforcement action and/or facility planning/implementation activities.				.14		EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
5. Review the adequacy of waste management facilities to serve new construction which is federally funded on Indian reservations.				.05		EPA
6. Conduct preliminary geological and water (surface and groundwater) evaluation throughout the state for purposes of siting solid and hazardous waste management facilities.		09-30-81	.50		20,150	SWMB
Public Participation: Solid Waste and Hazardous Waste						
1. Refine existing procedures for public input in developing: a. Regulatory powers, Authorization Plan and annual work program.	01-01-81		.03		1,226	SWMB
2. Maintain current procedures for public input in the issuance of permits.		on-going	.02		800	SWMB
3. Maintain system for investigation of public reports of possible violations.		on-going	.02		800	SWMB
4. Maintain current systems for information dissemination and consultation.		on-going	.08		3,306	SWMB
		Federal Grant			212,200	
		State Resources			42,039	
		Totals	5.60	2.40	254,239	

Pesticides MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
I. Maintain and improve the established quality of the pesticide enforcement and laboratory program.						
A. Field Activities						
1. Use/Misuse Inspection			4.5		112,881	DOA
a. Conduct misuse investigation	10	120				
b. Conduct use observations primarily of commercial, agriculture, and non-agriculture use (emphasis on aquatic herbicides and 1080 program)	10	150				
c. When a violation is suspected - collection of formulation and residue samples		630				
2. Experimental Use Permits			0.50		10,000	DOA
a. Monitor E.P.A.-E.U.P.'s	5	20				
b. Monitor State-E.U.P.'s	5	20*				
c. Samples collected when violation suspected	10	40*				
3. Producer Establishment Inspection			0.35		7,800	DOA
a. Inspect each producer establishment once every two years	27	27				
b. Sample each restricted use pesticide once every two years and each general use once every five years	32	32				
c. Determine if proper records are being maintained	27	27				
4. Marketplace Inspection	125	250	0.7		17,750	DOA
a. General use pesticides-violative labeling						
b. Restricted use pesticides-violative labeling						
c. Non-registered pesticides						
d. Pesticides subject to decomposition - sample if over one year old						
e. Surveillance for suspended-cancelled products						
f. Surveillance for products produced in nonregistered establishments						

Pesticides MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
5. Monitoring State Certification Plan			1.9		72,400	DOA
a. Determine if dealers are selling restricted use pesticides in violation of 12(a)(2)(F). Inspect records.	94	188				
b. Check applicators to see if licensed and are maintaining proper records. Inspect use of restricted use pesticides to determine if they are being used in accordance with label instructions.	200	600	1.40		28,200	DOA
6. Other			1.40			
a. Imports, exports, recalls, cancellations, suspensions		120				
b. Embargo and incident investigations						
c. 24(c) registrations and Section 18 Exemptions						
7. Special Enforcement Problems (Efficacy, Bioassay, Laboratory analysis of biological samples)	4	12	2.0		41,750	DOA
8. Legal Support**			0.5		14,386	DOA
9. Clerical Support			2.1		31,141	DOA
10. Administrative Support			1.4		37,824	DOA
11. Employing Training			0.45		10,800	DOA
B. Laboratory Operations and Programs					135,216	DOA
1. Sample Analysis						
a. Formulation	495	990	1.46			
b. Residue	45	900	1.63			
c. Other (EPA samples)		300	0.91			
2. Quality Assurance Program			0.80			
3. Clercial Support			0.25			
4. Administrative Support			0.46			
5. Employee Training			0.24			

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
C. EPA overview of grant activities				1.2		EPA
		Total	21.55	1.2	520,148	
		Indirect Charges			37,393	
		Grand Total			557,541	
*If section 5(f) is approved						
**Case jackets are being provided to EPA on a monthly basis						
II. Maintain the established pesticide applicator certification and training programs						
1. Certification Program			1.02			DOA
a. Data processing					32,000	
b. Licensing (dealers and applicators)	4,425	5,900				
2. Training					8,000	
a. Certification (new)	200	400				
b. Recertification	3,100	3,100				
3. EPA overview of and participation in grant activities				.05		EPA
		Total	1.02	.05	40,000	

Butte Radiation Program MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
1. Implement study to determine contributing factors to elevated radiation levels in Butte	05-15-80		2.6		81,804	OHB
a. Establish and operate station for measuring ambient radon and radon daughter concentrations in the city of Butte	06-15-80	continuing	0.3		9,439	OHB
b. Measure radon progeny in approximately 100 structures using RIPISU's		continuing	0.5		15,732	OHB
c. Conduct preliminary evaluation of radon and radon progeny levels and sources in the city of Butte	07-15-80		0.3		9,439	OHB/ EPA L.V.
d. Place 150-200 track etch dosimeters in the soil in the Butte area to determine radon soil gas concentrations.	08-01-80		0.6		18,878	OHB
e. Perform radon exhalation tests on construction materials		continuing	0.3		9,439	OHB
f. Collect environmental samples for laboratory radio-analysis		as needed	0.1		3,145	OHB
g. Determine radon and radon progeny concentrations in structures utilizing the grab sample method		continuing	0.5		15,732	OHB
2. Provide guidance to state for its radiation testing program with Region 8 Housing and Urban Development Office and compute report development for Butte/Anaconda Aerial Radiometric Survey		continuing		0.3		EPA
		Total	2.6	0.3	81,804	

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MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Noise						
1. State assessment of noise problems, training and organization.	Jan. 1981					DHES/EPA
a. Training	Dec. 1980		0.05	0.05	1,299	
b. Organization	Dec. 1980		0.10		2,597	
c. Physical Survey	Dec. 1980		0.15	0.15	3,896	
2. Develop State Noise program strategy		July 1981				
3. Prepare statewide assessment repart	Feb. 1981		0.1		2,597	DHES/EPA
a. Assess alternative strategies		April 1981	0.1	0.1	2,597	
b. Determine legislative needs, draft and introduce if feasible.		July 1981	0.1		2,597	
4. Program Implementation		3 cities				DHES/EPA
a. Local technical assistance			0.20	0.1	5,195	
b. Public education/awareness		on-going	0.10	0.05	2,597	
c. Prevention		on-going	0.05	0.05	1,299	
d. Personnel Actions		Aug. 1981	0.05		1,299	
e. Second year planning		Aug. 1981	0.05		1,299	
		Total	1.05	0.5	27,272	
Toxic Substances						
1. Assist in developing work plans for identified toxic substances of concern in Region VIII.						
a. Review and comment on all six strategies. Provide assistance in characterizing specific local problems and respond within 30 days.	3	6				DHES

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
2. Implement PCB work plan in Montana.						EPA
a. Inspect facilities which store or use PCB containing material.	30 during FY 80	75				
b. Prepare any technical documentation in support of enforcement actions on violations found during inspections within 30 da6s.						EPA
c. Complete inventory of all sources subject to the PCB provisions of TSCA.	11-01-80					EPA
3. Strengthen and assist state in developing an integrated toxics program.						
a. Establish guidance committee for developing state's strategy.	3-31-81					DHES/DCA
b. Develop strategy.		9-30-81				DHES/DCA
4. Implement public awareness of PCB program.						
a. Insure newsletters, speeches, etc. are given adequate coverage by the local press.						EPA
b. If needed, put on workshops.						EPA
		Total		.3		
Asbestos in Schools Program						
Protect health and well-being of children in the State of Montana attending schools that contain friable asbestos materials.						
1. Provide information and technical assistance to school districts.		on-going				EPA
2. Develop strategy for implementation of proposed mandatory program.		1/31/80				EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
3. Coordinate asbestos disposal activities within 30 days of notification		on-going				DHES/EPA
4. Provide for asbestos analysis capabilities through the State Department of Environmental Sciences.		12-01-81				EPA
		Total		0.1		
Indian Activities						
1. Air Programs						
a. Assist tribes in developing air quality programs						
b. New Programs	3	3		.12	180,000	EPA
c. On-going	3	3		.13	180,000	EPA
2. Solid Waste						
a. Provide technical assistance to tribes	2	4		.2		EPA
3. Pesticides						
a. Assist tribes in developing pesticide certification and enforcement programs.	2	2		.15		EPA
4. Implementation or completion of Indian 208 plans	preliminary funding requests are presently being evaluated			0.4	to be determined	
a. Blackfeet						USFWS & Blackfeet
b. Northern Cheyenne						NC Research
c. Crow						USFWS
d. Fort Belknap						Ft. Belknap
e. Fort Peck						Ft. Peck

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MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Flathead Study						
1. Assure that the Flathead Study is conducted in a timely and efficient manner in conformance with congressional and EPA intent, and in pursuit of adopted Steering Committee goals.						
a. Serve as EPA representative on Flathead Study Steering Committee.	1 meeting per month			.1		EPA
b. Serve as EPA liaison with Study Area Manager				.05		EPA
c. Serve as Project Officer (Co-Officer on two grants on four major research grants.)				.05		EPA
d. Award FY 1981 Grant					355,000	EPA
e. Flathead fishery study	1983					DFWP
f. Flathead limnology study	1983					
g. Air quality monitoring and modeling	1983					AQB
h. Administration/coordination of study	1983					UofM Dept of Natural Resources and Conservation
Federal Agency EIS Review						
1. Impact federal agencies (BLM, FS, BPA, USGS, OSM) to gain environmentally acceptable energy development project.						
a. Consult (pre-EIS) with USGS on Powder River Regional EIS/review draft EIS.	draft EIS in Sept-Oct 1980 final Feb 81			.15		USGS/MT Dept of State Lanc
b. Libby re-regulation dam						FPA/MT Dept of St.Lands
c. Mining plans	continuous probably 2 plans in FY 81					OSM,etc.

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
2. Impact various federal agencies to gain environmentally acceptable projects						
a. Pre-EIS consultation/EOS review of Forest Service Management Plans.	3 management plans in FY 81			.20		U.S.FS
b. Pre-EIS consultation/EIS review of BLM grazing plans, energy area land use plans, and other land use plans.	2 plans in FY 81					US BLM
c. Pre-EIS consultant/EIS review of highway plans, airport plans, etc.	10 EIS's/plan in FY 81					Dept. of Trans., HUD, etc.
d. Pre-EIS consultation/EIS review of water development projects	numerous river plans	Approx. 3 FY 81				COE, Bureau of Rec., SCS
Emergency Response						
A. Direct control, mitigation or cleanup of spills and severe environmental emergencies when responsible party fails to properly respond.						
1. Provide funding and arrange for cleanup of all spills of oil or designated hazardous substances entering or threatening water.	1	1		0.05		EPA
2. Provide assistance to EPA in conducting spill cleanup for oil or designated hazardous substances in accordance with state responsibilities outlined in Regional Response Team's Region VIII Oil and Hazardous Substances Pollution Contingency Plan.	1	1	0.01			State
3. Seek funding and arrange for control and mitigation of severe environmental emergencies, not included in #1 above.	1	1	As Needed	0.05		EPA & State

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MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
B. Monitor control, mitigation or cleanup of spills and environmental emergencies performed by responsible party.						
1. EPA will provide Federal On-Scene Coordinator (OSC) for all major and selected (on case-by-case basis as jointly determined by EPA and the state) medium and minor spills of oil or designated hazardous substances entering or threatening water. State will provide assistance to Federal OSC and will provide State OSC on selected medium and minor spills.	2	2	0.05	0.10		EPA & State
2. EPA to provide Federal OSC for monitoring response to severe environmental emergencies not included in #1. State to provide OSC for less severe environmental emergencies.	1	2	0.05	0.05		EPA & State
3. Emergency response coordination (not on-scene)	30	60		0.10		EPA & State
C. Spill Prevention						
1. Conduct SPCC Plan compliance inspection.	5	25		0.25		EPA
2. Accompany EPA inspectors on selected compliance inspections.	6	15	0.01			State
3. Review SPCC Plans for amendment considerations following all triggering spills.	1	2	As Needed	0.05		EPA & State
D. Contingency Planning						
1. Update Regional VIII Oil and Hazardous Substances Pollution Contingency Plan.		3/31/81		0.10		EPA

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
2. Complete state multi-agency, multi-media environmental emergency contingency plan.	Final 12/31/80		0.03			State
3. Update State Oil and Hazardous substances pollution contingency plan.		7/1/81	0.02			State
E. Training of state and local emergency response personnel.						
1. Insure adequate safety training provided to state personnel responsible responding to hazardous material emergencies.	As resources permit					State
2. Conduct training activities and exercises to insure that all parties having responsibilities under the environmental emergency contingency plan are aware of their roles and responsibilities.	3	3	0.03			State
3. Assist state in performing outputs No. 1 & 2 above upon request by the state.	1	2		0.06		EPA
Quality Assurance Programs		Total	0.20	0.81	7,175	
1. All Media						
a. Review State QA documentation annually.						EPA
b. Provide QA guidance.						EPA
c. Provide audit and reference samples (as required)						EPA
d. Provide technical assistance (as requested).						EPA
e. Overview State's quality assurance activities and provide assistance as necessary.						EPA
2. Air						
a. Ambient: Continuing implementation of 40 CFR Part 58 Ambient Air Monitoring Quality Assurance Regulations.			*	*		State/ EPA

Categorical MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
b. Source: Continuing implementation of quality assurance requirements for 40 CFR Parts 52 and 60, regarding stack testing and continuous emission monitoring for SIP and NSPS sources.			*	*		State/ EPA
3. Water						
a. Evaluate State's water monitoring quality assurance program.		1		0.3		EPA
b. Continue to develop, implement and improve the State's water monitoring quality assurance program.			0.5			State
c. Evaluate State principal laboratory for compliance with the SDWA certification criteria.		1		0.2		EPA
d. Administer State's SDWA Laboratory Certification Program.			0.2			State
e. Evaluate and audit local SDWA laboratories.		18	0.6			State
f. Overview State's SDWA Laboratory Certification Program.				0.05		EPA
4. Pesticides						
a. Evaluate State's Quality Assurance plans and activities associated with the Pesticide Enforcement Grant; provide audit samples.				0.15		EPA
b. Continue to develop and improve State's Pesticide Quality Assurance Program.			0.3			State

*See specific air monitoring work plans for details.

ACTIVITY/OUTPUT	MILESTONE		RESOURCES			RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE LOCAL	WORKYEARS EPA	DOLLARS	
Public Participation						
1. 1982 Montana EPA Agreement:						
a. Send out survey to solicit public input on state environmental priorities.	10-01-80					EPA, DOA, DOH
b. Evaluate responses to survey and prepare analysis.	12-01-80					EPA, DOA, DOH
c. Send out draft priorities list.	01-31-81					EPA, DOA, DOH
d. Prepare final 1982 priorities program activities.	03-31-81					EPA, DOA DOH
2. General:						
a. In addition to public participation activities required under each program, hold public meetings on important issues as they arise. Prepare a strategy for identifying issues for which a public meeting would be useful.		04-01-81				EPA, DOA DOH